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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF WASHINGTON

8 UNITED STATES OF AMERICA,)

9 Plaintiff,)

10 v.)

11 RICHARD JOHN NOVAK,)

12 Defendant.)
13

05-CR-180-3-LRS

United States'
Sentencing Memorandum

14 Plaintiff United States of America, by and through James A. McDevitt,
15 United States Attorney for the Eastern District of Washington, and George J.C.
16 Jacobs, III, Assistant United States Attorney for the Eastern District of
17 Washington, submits the following Sentencing Memorandum.

18 The Presentence Investigation Report ("PSR"), dated August 22, 2008,
19 calculates the Defendant's advisory Guidelines Total Offense Level as 23, his
20 Criminal History Category as I, and his advisory Guidelines sentencing range of
21 imprisonment as 46-57 months. PSR, paras. 246, 299. The United States has
22 previously filed its objection to the PSR.

23 The United States contends that the Final Offense Level for conspiracy to
24 commit wire/mail fraud is 27, unless the United States files a motion under
25 U.S.S.G. § 5K1.1 or the Defendant seeks and the Court determines that a minor
26 participant or some other downward adjustment/departure is applicable. The
27 parties agree and stipulate that the Final Offense Level for conspiracy to violate the
28

1 Foreign Corrupt Practices Act is 17, unless the United States files a motion under
2 U.S.S.G. § 5K1.1 or the Defendant seeks and the Court determines that some other
3 downward adjustment/departure is applicable. *See* March 20, 2006 Plea
4 Agreement. The parties further agree and stipulate that the Defendant's payment
5 of bribes to Liberian government officials was committed for the purpose of
6 facilitating the commission of another criminal offense, specifically, conspiracy to
7 commit wire/mail fraud and that the cross reference in the guideline requires the
8 Court to apply the guideline applicable to the conspiracy to commit wire/mail fraud
9 if the resulting offense level is higher. U.S.S.G. § 2C1.1(c)(1). Assuming that the
10 Court ultimately determines that the resulting offense level for conspiracy to
11 commit wire/mail fraud is greater than the resulting offense level for the
12 conspiracy to violate the Foreign Corrupt Practices Act, the parties further agree
13 that the offense guideline for the conspiracy to commit wire/mail fraud should be
14 applied. U.S.S.G. § 2C1.1(c)(1).

15 The United States is filing a separate motion pursuant to U.S.S.G. § 5K1.1
16 because the Defendant provided "substantial assistance" in the investigation and
17 prosecution of the masterminds (Dixie Ellen Randock and Steven Karl Randock,
18 Sr.) of a sophisticated global internet scheme that sold 10,815 degrees to 9,612
19 consumers in 131 countries for \$7,369,907. The Defendant also provided
20 "substantial assistance" in the investigation and prosecution of several employees
21 of the internet scheme. The nature and extent of the Defendant's assistance will be
22 detailed in its separately filed motion. As a result of the Defendant's "substantial
23 assistance," the United States recommends that the Court depart downward from
24 an advisory offense level 27 to an advisory offense level 10, and impose a term of
25 imprisonment of 6-12 months, followed by three years of supervised release.

I. 18 U.S.C. § 3553(a)(1) Factors – Nature/Circumstances of the Offense – History/Characteristics of Defendant

The Defendant is fifty-eight years old. He attended Lewis and Clark High School and Central Valley High School. The Defendant's relationship with Dixie Ellen Randock dates back to high school. The Defendant's prior work experience includes selling used and new cars and timeshares in Mexico. The Defendant worked for Dixie Ellen Randock and Steven Karl Randock, Sr.'s diploma mill business between April, 2002, and August 11, 2005, until a Federal search warrant was executed at his residence in Arizona during the Operation Gold Seal investigation. The United States also incorporates, by reference, the facts set forth in the Plea Agreement and Presentence Investigation Report.

Defendant Promoted the Internet Scheme by Traveling to Washington, D.C., to obtain "Apostilles" for False Academic Products Sold by the Diploma Mill

On August 11, 2005, United States Secret Service Special Agent Greg Ross interviewed the Defendant at his residence in Arizona. The Defendant was advised of his Miranda rights per SSF 1737B, which he signed and agreed to waive and be interviewed. The Defendant stated that Dixie Ellen Randock hired him to obtain "apostille"¹ documents for students in the Middle East who had purchased Saint Regis University degrees and transcripts. These "apostilles" were used to "authenticate" the false degrees and transcripts that Dixie Ellen Randock and her team of "advisors" sold. The Defendant stated that, though "Saint Regis University," Dixie Ellen Randock and Steven Karl Randock, Sr., sold a large number of "degrees" to "students" from Saudi Arabia, the United Arab Emirates (UAE), and other Middle Eastern and Asian countries. The Defendant stated that after September 11, 2001, he had a conversation with Dixie Ellen Randock about

¹An "apostille" is a certificate issued by a designated authority in a country where a treaty (The Hague Convention Abolishing the Requirement for Legalization of Foreign Public Documents) applies. The apostille consists of 10 elements. The Convention requires that all apostilles be numbered consecutively, with individual numbers applied to each apostille issued.

1 his concerns over the number of degrees that the diploma mill was selling to
2 consumers in Middle East countries. The Defendant stated that he told Dixie Ellen
3 Randock that he hoped she was properly screening and verifying her “students.”
4 The Defendant stated that Dixie Ellen Randock told him that she was “not worried
5 about it.”

6 The Defendant stated that he received \$150-\$200 for each “document
7 packet” he was asked to provide for a particular “student” through that person’s
8 home country embassy in Washington, D.C. The Defendant stated that he knew
9 the degrees he was obtaining “apostilles” for were fake, however, he believed what
10 he was doing was not illegal because he was simply providing “official
11 documents.” The Defendant stated that he felt that anyone who paid for these
12 worthless “apostilles” was an “idiot.” The Defendant stated that he did not feel
13 that it was his responsibility to protect people who would pay an exorbitant amount
14 of money to Dixie Ellen Randock and Steven Karl Randock, Sr., for these
15 documents. After reviewing invoices, the Defendant estimated that Dixie Ellen
16 Randock paid him approximately \$60,000-\$70,000 during the period 2002 and
17 2003. In addition, for approximately nine months in 2002, the Defendant received
18 a monthly salary of \$1,500 from Dixie Ellen Randock and Steven Karl Randock,
19 Sr. The Defendant stated that he felt that the money he received was a very small
20 amount compared to the “millions and millions” that Dixie Ellen Randock and
21 Steven Karl Randock, Sr., earned during the same period. The Defendant stated
22 that, aside from Dixie Ellen Randock and Steven Karl Randock, Sr., he only knew
23 of “a couple” of other individuals who operated “diploma mills” on such a large
24 scale in the United States.

25 The Defendant stated that Amy Hensley was the primary accountant for
26 “Saint Regis.” Ms. Hensley was also an “advisor” to applicants, a document
27 processor, and a shipper of documents. The Defendant stated that Heidi Lorhan
28 was the only other person, aside from Dixie Ellen Randock and Steven Karl

1 Randock, Sr., who made “a lot of money” from the internet university scheme.
2 The Defendant stated that Heidi Lorhan worked as an “advisor” who screened and
3 communicated with “applicants.” The Defendant stated that Roberta Markishtum
4 worked in the printing shop and processed paperwork. Regarding Blake Carlson,
5 the Defendant stated that he provided Dixie Ellen Randock with the ink signature
6 stamps and several other “official” implements, e.g., embossers, that Dixie Ellen
7 Randock and Steven Karl Randock, Sr., used when manufacturing degrees. The
8 Defendant stated that Blake Carlson is a long-time friend of his, and that he had
9 numerous conversations with Blake Carlson about the fact that Dixie Ellen
10 Randock wrongfully used their names on her “school” documents. The Defendant
11 stated that “a couple of years ago” he noticed that Dixie Ellen Randock had listed
12 the Defendant and Blake Carlson as “professors” on the “Saint Regis University”
13 internet site. The Defendant stated that he contacted Dixie Ellen Randock and told
14 her to remove their names from the “faculty” list.

15 The Defendant stated that Dixie Ellen Randock “invented” the name
16 “Thomas Carper” as the “President” of “Saint Regis University” to “take the heat
17 off.” The Defendant stated that Dixie Ellen Randock used that name so she could
18 remain anonymous when communicating with third parties.

19 The Defendant stated that he did not process or sell any of the “degrees,”
20 “transcripts,” “Dean’s Lists,” “letters from the school,” or “records verifications.”
21 The Defendant stated that the only documents he ever produced or handled were
22 the “attestations” and apostilles. The Defendant stated that he was upset to learn
23 that Dixie Ellen Randock used his signature stamp on false documents. He stated
24 that he never gave Dixie Ellen Randock permission to represent him as any
25 “official” or “representative” of her “schools” other than one agreed-upon title of
26 “Director of University Services.” The Defendant stated that any documents
27 bearing any other titles associated with his name, including “President” or
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1 “Registrar” are false documents and were produced illegitimately without his
2 knowledge and approval.

3 The Defendant stated that he knew that Dixie Ellen Randock and Steven
4 Karl Randock, Sr., “pretty much shut down Saint Regis” in 2004 following a
5 lawsuit filed against them by a legitimate university, Regis University. The
6 Defendant stated that in late 2004, Dixie Ellen Randock and Steven Karl Randock,
7 Sr., shifted their focus largely to “James Monroe University” and “Robertstown
8 University,” with “James Monroe University” serving as the flagship “school”
9 drawing most of the former “Saint Regis” business. The Defendant stated that
10 Dixie Ellen Randock and Steven Karl Randock, Sr., continued to operate “Saint
11 Regis University” and “James Monroe University,” representing them in their
12 website and other materials as “accredited” and “recognized” by the country of
13 Liberia, despite the fact that Liberia had already stated that such “accreditation”
14 and “recognition” was invalid.

15 *Defendant Promoted the Internet Scheme by Paying Bribes to Foreign*
16 *Government Officials and Traveling Overseas*

17 The Defendant stated that he was the diploma mill’s primary liaison to the
18 Liberian government, representing Dixie Ellen Randock and Steven Karl Randock,
19 Sr., and their interests in “Saint Regis University,” “James Monroe University,”
20 and “Robertstown University.” As the primary liaison, the Defendant made
21 several trips to Washington, D.C., and overseas, had meetings with high-ranking
22 foreign government officials, including the Liberian Consul in Washington, D.C.,
23 and paid bribes to several foreign government officials, in order to obtain
24 “accreditation” documents for Dixie Ellen Randock’s “schools,” and to ensure that
25 Liberian embassy staff stationed in Washington, D.C., and elsewhere would make
26 positive comments about Dixie Ellen Randock’s “schools” if inquiries were made.
27 As a result of the Defendant’s efforts, Dixie Ellen Randock and Steven Karl
28 Randock, Sr., represented on their internet sites that their “schools” were

1 “accredited” by the Liberian Ministry of Education. The Defendant also attended a
2 presidential inauguration in Monrovia, Liberia. On another occasion, he tried to
3 influence the Liberian Government to get a Liberian official reinstated to his/her
4 post at the Liberian Embassy, in Washington, D.C. The Defendant has admitted
5 paying bribes to several Liberian officials in the United States and overseas.

6 In 2004, the Defendant traveled to Bangalore, India, at Steven Karl
7 Randock, Sr.’s instructions. The Defendant was instructed to locate an individual
8 that Steven Karl Randock, Sr., and Dixie Ellen Randock claimed had stolen money
9 from them. In 2002, the Defendant traveled with Steven Karl Randock, Sr., to the
10 British Virgin Islands in order to meet with an attorney and obtain apostilles for
11 Saint Regis University.

12 *Defendant Promoted the Internet Scheme by Assisting Dixie Ellen*
13 *Randock and Steven Karl Randock, Sr., in Selling Degrees to United*
14 *Auto Worker Members*

15 The Defendant assisted Dixie Ellen Randock and Steven Karl Randock, Sr.,
16 in business development by representing the diploma mill at a meeting in Detroit,
17 Michigan, with the United Auto Workers (UAW). As a result, some UAW
18 members eventually purchased several degrees. The Defendant received
19 approximately \$2,700 from the sales of degrees to UAW members.

20 *Defendant Promoted the Internet Scheme by Acting as an*
21 *“International Consultant” and Offering His Expertise in Obtaining*
22 *“Accreditation” from Liberian Government Officials*

23 During the Operation Gold Seal investigation, United States Department of
24 Homeland Security, United States Secret Service, Special Agents, acting in an
25 undercover capacity and posing as businessmen interested in learning how to sell
26 degrees online based on “life experience” and in obtaining “accreditation,” had
27 several contacts with the Defendant. The Defendant represented himself as being
28 an “international consultant” and as an individual who acted on behalf of the Saint

1 Regis University “board.”² In their undercover capacities, the Special Agents
2 represented that they were in the process of establishing an online school,
3 Randolph Addison Technical University (RADTU) and needed guidance. These
4 contacts, which occurred over several months, eventually resulted in a meeting
5 with the Defendant in a hotel room in Washington, D.C. At the meeting, the
6 Defendant offered his assistance by traveling to Liberia to obtain “accreditation”
7 for RADTU. During the meeting, the Defendant stated that he had a “Liberian
8 contact” and that, when doing business in Liberia, the key to success is making
9 sure that money finds its way “into pockets.” The meeting was recorded and
10 videotaped.

11 The Defendant was an important player in a sophisticated global internet
12 scheme that sold thousands of degrees and related academic products to buyers in
13 countries throughout the world. *See e.g., Analysis of the Operation Gold Seal*
14 *“Buyers List,”* prepared by the United States Department of Homeland Security,
15 United States Secret Service, at pp. 2-8 (hereinafter referred to as *Exhibit A*). The
16 scheme simply provided the Defendant with an opportunity to make money and
17 travel abroad. Based upon the Secret Service’s analysis of the diploma mill’s
18 business records, the diploma mill’s monthly revenues routinely exceeded
19 \$100,000 between February, 2002, and January, 2005. *See Exhibit A-2*. The
20 monthly revenues dropped somewhat when the Government of Liberia declared
21 Saint Regis illegal in the latter part of 2004. *Id.* The scope of the offense was
22 massive, and the totality of the harm cannot be adequately measured.

27 ² These contacts are detailed in a Summary attached hereto as Exhibit D.
28 Investigators subsequently identified the “board” as being Dixie Ellen Randock
and Steven Karl Randock, Sr.

II. 18 U.S.C. § 3553(a)(2) Factors – Need for Sentence Imposed To Reflect Seriousness of the Offense – To Promote Respect for the Law – To Provide Just Punishment for the Offense – To Afford Adequate Deterrence to Criminal Conduct – To Protect the Public from Further Crimes of the Defendant

Defendant's Offense Conduct Put the Public at Significant Risk of Danger

The Defendant's offense conduct threatened homeland security. See, e.g., *Exhibit B*, Sarah Antonacci, *Diploma Mills Pose Degrees of Danger*, The State-Journal-Register, February 19, 2008 ("Academic documents that indicate a person has certain kinds of training . . . can help a person obtain an H-1B visa for entry into the United States"); *Exhibit C*, Bill Morlin, *Bogus Degrees Offer Way to U.S.*, The Spokesman-Review, August 16, 2005, at A1; *Exhibit C-1*, Bill Morlin, *Bill Targets 'Diploma Mills': Spokane Criminal Case Inspires Federal Legislation*, The Spokesman-Review, November 11, 2007, at B1 ("The revelation that potential terrorists could use bogus degrees to enter the United States caused homeland security concerns that reached the highest levels of government"). The Defendant's conduct put the public at a significant risk that foreign nationals, including potential terrorists, could have gained entry into the United States with fraudulent degrees purchased from the Defendant. While the Defendant did not actually sell any degrees or transcripts, he obtained apostilles and other documents attesting to the "authenticity" of false and fraudulent degrees sold to foreign nationals.

The Defendant's offense conduct also put the public at risk that thousands of unqualified individuals who purchased degrees and apostilles are now providing substandard "professional" services in the medical, engineering, education, counseling, and other fields. The risks to the public which are endemic to the sale of fraudulent academic products by diploma mills, such as the Defendant's, have been described in *Degrees of Deception: Are Consumers And Employers Being*

1 *Duped By Online Universities And Diploma Mills?*, by Creola Johnson, Associate
 2 Professor, The Ohio State University, Michael E. Moritz College of Law, Journal
 3 of College and University Law, vol. 32, No. 2, pp. 411-89 (hereinafter *Degrees of*
 4 *Deception*),

5 [b]esides the potential to defraud employers, online diploma mills and
 6 substandard unaccredited schools put the public at risk of danger from
 7 their 'graduates' who perform professional services, such as when a
 8 mother watched her eight-year old daughter die after a doctor with
 9 fake degrees advised taking her off insulin. In addition to posing a
 10 risk of harm to the public, numerous online degree providers actively
 11 deceive *unsophisticated consumers* about their accreditation status
 12 and their degree-granting practices. (emphasis in original). Many of
 these degree providers confer degrees to consumers by heavily
 crediting their prior life experiences – such as employment history and
 previous education – and requiring them to complete substantially less
 academic work than is required at traditional accredited universities.
 Playing on working adults' desperation for increases in wages and
 employment opportunities, substandard degree providers assure
 prospective students that their practices are perfectly legal.

13 *Degrees of Deception*, at 415-16.

14 *Defendant's Bribery Conduct Was Unethical and Counter to the*
 15 *Moral Expectations and Values of the American Public*

16 According to Congress,

17 The payment of bribes to influence the acts or decisions of foreign
 18 officials, foreign political parties or candidates for foreign political
 19 office is unethical. It is counter to the moral expectations and values
 20 of the American public. But not only is it unethical, it is bad business
 21 as well. It erodes public confidence in the integrity of the free market
 22 system. It short-circuits the marketplace by directing business to
 23 those companies too inefficient to compete in terms of price, quality,
 24 or service, or too lazy to engage in honest salesmanship, or too intent
 upon unloading marginal products. In short, it rewards corruption
 instead of efficiency Corporate bribery also creates severe
 foreign policy problems for the United States. The revelation of
 improper payments invariably tends to embarrass friendly
 governments, [and] lower the esteem for the United States among the
 citizens of foreign nations

25 House Rep. No. 95-640, 95th Cong., 1st sess.

26 *General Deterrence - Respect for the Law*

27 This case presents the Court with an opportunity to deter diploma mills,
 28 diploma fraud, and foreign corrupt practices act violations nationwide. The instant

1 prosecution has received publicity at the local, national, and international level.
2 According to one newspaper, Operation Gold Seal has sent shock waves nation-
3 wide. General Deterrence in this case depends upon the public seeing some
4 consequence for the Defendant's actions beyond a probationary sentence.
5 Imposing a 6-12 month term of imprisonment will promote respect for the law and
6 act as a deterrent to other potential employees of diploma mills and individuals
7 who try to undercut our free market system by paying bribes to foreign officials.

8 *Specific Deterrence of Defendant From Further Crimes*

9 Another important goal of criminal sentencing is to protect the public "from
10 further crimes of the defendant." 18 U.S.C. § 3553(a)(2). A 6-12 month term of
11 imprisonment will serve that end. The United States believes that a sentence of
12 probation would not reflect the seriousness of the offense, promote respect for the
13 law, provide just punishment, afford adequate deterrence to criminal conduct, or
14 protect the public from further crimes. The Defendant has been convicted of
15 serious offenses.

16 *The Need to Avoid Unwarranted Sentencing Disparities Among*
17 *Defendants With Similar Records Who Have Been Found Guilty of*
18 *Similar Conduct*

19 The Court must avoid unwarranted sentencing disparities among Defendants
20 with similar records who have been found guilty of similar conduct. Four non-
21 cooperating co-defendants have already been sentenced in this case. The United
22 States recommended a 36-month term of imprisonment for Defendants Dixie Ellen
23 Randock and Steven Karl Randock, Sr., an 18-month term of imprisonment for
24 Defendant Heidi Kae Lorhan, and a 6-month term of imprisonment for Defendant
25 Roberta Lynn Markishtum. On July 2, 2008, and August 5, 2008, the Court
26 sentenced the two masterminds of this global internet scheme, Dixie Ellen
27 Randock and Steven Karl Randock, Sr., to serve 36-month terms of imprisonment,
28 followed by three years of supervised release. Both Defendants pled guilty to

1 Conspiracy to Commit Mail/Wire Fraud. On July 2, 2008, the Court sentenced the
2 highest paid “advisor,” Heidi Lorhan, to serve a term of imprisonment of 12
3 months and one day and the “printer” and “verifier,” Roberta Markishtum, to serve
4 a four-month term of imprisonment. Defendant Lorhan pled guilty to Conspiracy
5 to Commit Mail/Wire Fraud and Defendant Markishtum pled guilty to Misprision
6 of a Felony.

7 **Conclusion**

8 For the foregoing reasons, and the reasons set forth in its separately filed
9 Substantial Assistance Motion, the Court should depart downward from offense
10 level 27 to offense level 10, and the Defendant should be sentenced to a term of
11 imprisonment of 6-12 months, followed by three years of supervised release.

12 DATED September 17, 2008.

13
14 James A. McDevitt
United States Attorney

15 s/George J.C. Jacobs, III

16 George J.C. Jacobs, III
17 Assistant United States Attorney
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2 I hereby certify that on September 17, 2008, I electronically filed the
3 foregoing with the Clerk of the Court using the CM/ECF System which will send
4 notification of such filing to the following, and/or I hereby certify that I have
5 mailed by United States Postal Service the document to the following non-
6 CM/ECF participant(s):

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14 George J.C. Jacobs, III
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Analysis of the Operation Gold Seal "Buyers List"

Nature of the "buyers list"

The Operation Gold Seal "buyers list" is built from a combination of paper and electronic records. Paper documents were obtained by investigators during search warrants of the defendants' homes and offices, while electronic records were found on various electronic internal and external storage media possessed by the defendants. Information from paper documents was loaded into a Microsoft Access database. Not all purchase records contain complete information about a transaction. For example, the name of the "university" to be printed on a customer's diploma is only present in some of the records.

About a third of the transactions from the defendants' degree-selling business are available in both the paper and electronic records, as shown in the following table. In the table all transactions for an individual customer have been combined into one record for that customer.

Transaction record source(s)	Number of transaction records
Available only in paper records	2,472 records
Available in both paper and electronic records	3,155 records
Available only in electronic records	3,985 records
Total	9,612 records

There is good consistency between the paper and electronic records. This can be seen by constructing two different transaction histories for the defendant's diploma mill organization (one in which priority is given to paper records and the other in which priority is given to electronic records). When the results are compared, there is a relatively small discrepancy (See below table).

Transactions used to build sales history	Payments	Revenue
All paper records + electronic records when paper records are unavailable	10,537	\$7,369,907
All electronic records + paper records when electronic records are unavailable	10,313	\$7,388,164
Difference	224	(\$18,257)

In the following sections, conclusions are based using all paper records in combination with electronic records, when paper records are unavailable. The reason for using this combination is because it is felt by investigators that the paper documents are likely more reliable.

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GOVERNMENT
EXHIBIT

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Total number of buyers

From the transaction history we see the following:

Buyers	Number of degrees and related academic documents purchased	Total sales
9,612	10,815	\$7,369,907

Country totals

Of 9,612 buyers, the shipping address for 9,165 of the buyers were available. The list of countries to which the fraudulent academic products were shipped, indicate a total of 131 different countries. The first table is sorted alphabetically by country name, while the second sorted by number of buyers.

Sales vs. Country (Sorted by country name)				
Line	Abbrev	Country	Buyers	Sales
1	AL	Albania	1	\$2,160
2	AG	Antigua and Barbuda	2	\$1,436
3	AR	Argentina	5	\$7,525
4	AM	Armenia	2	\$572
5	AW	Aruba	2	\$3,147
6	AU	Australia	52	\$59,960
7	AT	Austria	5	\$5,412
8	BS	Bahamas	6	\$5,968
9	BH	Bahrain	12	\$7,523
10	BD	Bangladesh	5	\$7,621
11	BE	Belgium	6	\$11,558
12	BJ	Benin	1	\$835
13	BM	Bermuda	4	\$12,618
14	BT	Bhutan	2	\$736
15	BO	Bolivia	6	\$9,208
16	BA	Bosnia-Herzegovina	5	\$5,014
17	BW	Botswana	1	\$1,405
18	BR	Brazil	13	\$13,888
19	BN	Brunei Darussalam	1	\$881
20	CM	Cameroon	3	\$4,064
21	CA	Canada	406	\$290,608
22	KY	Cayman Islands	3	\$3,324
23	CL	Chile	6	\$3,985
24	CN	China	6	\$3,981
25	CO	Colombia	3	\$1,812
26	CR	Costa Rica	3	\$3,033

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27	CY	Cyprus	8	\$5,706
28	CZ	Czech Republic	3	\$5,213
29	DO	Dominican Republic	2	\$1,630
30	EC	Ecuador	3	\$7,173
31	EG	Egypt	13	\$15,271
32	SV	El Salvador	4	\$5,351
33	ER	Eritrea	2	\$198
34	ET	Ethiopia	2	\$2,630
35	FI	Finland	2	\$1,826
36	FR	France	6	\$5,331
37	GA	Gabon	70	\$45,738
38	GM	Gambia	1	\$2,351
39	DE	Germany	69	\$89,282
40	GH	Ghana	19	\$31,883
41	GB	Great Britain	148	\$132,261
42	GR	Greece	17	\$14,741
43	GU	Guam (USA)	3	\$2,838
44	GT	Guatemala	2	\$1,627
45	GY	Guyana	1	\$731
46	HT	Haiti	1	\$386
47	HK	Hong Kong	29	\$27,537
48	HU	Hungary	2	\$936
49	IN	India	80	\$71,968
50	ID	Indonesia	11	\$8,152
51	IR	Iran	27	\$47,964
52	IE	Ireland	14	\$17,939
53	IL	Israel	9	\$7,542
54	IT	Italy	15	\$20,533
55	CI	Ivory Coast (Cote D'Ivoire)	1	\$1,429
56	JM	Jamaica	8	\$4,831
57	JP	Japan	20	\$16,985
58	JO	Jordan	11	\$19,704
59	KE	Kenya	14	\$14,387
60	KW	Kuwait	16	\$18,475
61	LB	Lebanon	13	\$20,099
62	LS	Lesotho	1	\$795
63	LR	Liberia	6	\$1,910
64	LY	Libya	1	\$1,185
65	MO	Macau	2	\$1,036
66	MK	Macedonia	2	\$1,227
67	MG	Madagascar	1	\$99
68	MW	Malawi	4	\$4,600
69	MY	Malaysia	51	\$61,342
70	MU	Mauritius	3	\$2,556
71	YT	Mayotte	1	\$99
72	MX	Mexico	13	\$14,609

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73	MA	Morocco	1	\$551
74	NA	Namibia	1	\$1,906
75	NP	Nepal	13	\$6,096
76	NL	Netherlands	10	\$10,239
77	AN	Netherlands Antilles	1	\$1,647
78	NZ	New Zealand	10	\$14,391
79	NG	Nigeria	49	\$90,591
80	MP	Northern Mariana Islands	1	\$951
81	NO	Norway	1	\$1,140
82	OM	Oman	5	\$4,844
83	PK	Pakistan	46	\$45,103
84	PG	Papua New Guinea	1	\$1,010
85	PE	Peru	5	\$2,599
86	PH	Philippines	6	\$6,442
87	PT	Portugal	18	\$22,493
88	PR	Puerto Rico	12	\$20,508
89	QA	Qatar	4	\$2,199
90	RO	Romania	3	\$2,247
91	RU	Russian Federation	1	\$3,460
92	RW	Rwanda	2	\$789
93	KN	Saint Kitts & Nevis Anguilla	1	\$1,495
94	LC	Saint Lucia	1	\$1,390
95	VC	Saint Vincent & Grenadines	1	\$750
96	SA	Saudi Arabia	69	\$89,600
97	SL	Sierra Leone	1	\$1,344
98	SG	Singapore	41	\$35,766
99	SI	Slovenia	2	\$2,851
100	ZA	South Africa	34	\$48,604
101	KR	South Korea	28	\$18,441
102	ES	Spain	17	\$15,333
103	LK	Sri Lanka	4	\$4,628
104	SD	Sudan	2	\$2,410
105	SR	Suriname	1	\$361
106	SE	Sweden	2	\$1,772
107	CH	Switzerland	13	\$24,542
108	SY	Syria	2	\$2,538
109	TW	Taiwan	12	\$20,597
110	TZ	Tanzania	4	\$12,123
111	TH	Thailand	16	\$13,799
112	TG	Togo	1	\$975
113	TT	Trinidad and Tobago	4	\$5,794
114	TN	Tunisia	1	\$690
115	TR	Turkey	5	\$9,109
116	TC	Turks and Caicos Islands	1	\$99
117	UG	Uganda	3	\$11,457
118	AE	United Arab Emirates	65	\$100,331

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119	UK	United Kingdom	1	\$561
120	US	United States	7298	\$5,198,320
121	UY	Uruguay	3	\$3,048
122	UM	USA Minor Outlying Islands	2	\$1,181
123	VE	Venezuela	12	\$10,048
124	VN	Vietnam	6	\$5,773
125	VG	Virgin Islands (British)	4	\$1,709
126	VI	Virgin Islands (USA)	10	\$4,151
127	WF	Wallis and Futuna Islands	1	\$99
128	EH	Western Sahara	1	\$99
129	YE	Yemen	2	\$4,065
130	YU	Yugoslavia	6	\$3,209
131	ZM	Zambia	6	\$11,145
		Total buyers with identified nationality	9165	\$7,137,787

Here is the list sorted by number of buyers in each country.

Sales vs. country, sorted by number of buyers				
Line	Abbrev	Country	Buyers	Sales
1	US	United States	7298	\$5,198,320
2	CA	Canada	406	\$290,608
3	GB	Great Britain	148	\$132,261
4	IN	India	80	\$71,968
5	GA	Gabon	70	\$45,738
6	DE	Germany	69	\$89,282
7	SA	Saudi Arabia	69	\$89,600
8	AE	United Arab Emirates	65	\$100,331
9	AU	Australia	52	\$59,960
10	MY	Malaysia	51	\$61,342
11	NG	Nigeria	49	\$90,591
12	PK	Pakistan	46	\$45,103
13	SG	Singapore	41	\$35,766
14	ZA	South Africa	34	\$48,604
15	HK	Hong Kong	29	\$27,537
16	KR	South Korea	28	\$18,441
17	IR	Iran	27	\$47,964
18	JP	Japan	20	\$16,985
19	GH	Ghana	19	\$31,883
20	PT	Portugal	18	\$22,493
21	GR	Greece	17	\$14,741
22	ES	Spain	17	\$15,333
23	KW	Kuwait	16	\$18,475
24	TH	Thailand	16	\$13,799
25	IT	Italy	15	\$20,533

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26	IE	Ireland	14	\$17,939
27	KE	Kenya	14	\$14,387
28	BR	Brazil	13	\$13,888
29	EG	Egypt	13	\$15,271
30	LB	Lebanon	13	\$20,099
31	MX	Mexico	13	\$14,609
32	NP	Nepal	13	\$6,096
33	CH	Switzerland	13	\$24,542
34	BH	Bahrain	12	\$7,523
35	PR	Puerto Rico	12	\$20,508
36	TW	Taiwan	12	\$20,597
37	VE	Venezuela	12	\$10,048
38	ID	Indonesia	11	\$8,152
39	JO	Jordan	11	\$19,704
40	NL	Netherlands	10	\$10,239
41	NZ	New Zealand	10	\$14,391
42	VI	Virgin Islands (USA)	10	\$4,151
43	IL	Israel	9	\$7,542
44	CY	Cyprus	8	\$5,706
45	JM	Jamaica	8	\$4,831
46	BS	Bahamas	6	\$5,968
47	BE	Belgium	6	\$11,558
48	BO	Bolivia	6	\$9,208
49	CL	Chile	6	\$3,985
50	CN	China	6	\$3,981
51	FR	France	6	\$5,331
52	LR	Liberia	6	\$1,910
53	PH	Philippines	6	\$6,442
54	VN	Vietnam	6	\$5,773
55	YU	Yugoslavia	6	\$3,209
56	ZM	Zambia	6	\$11,145
57	AR	Argentina	5	\$7,525
58	AT	Austria	5	\$5,412
59	BD	Bangladesh	5	\$7,621
60	BA	Bosnia-Herzegovina	5	\$5,014
61	OM	Oman	5	\$4,844
62	PE	Peru	5	\$2,599
63	TR	Turkey	5	\$9,109
64	BM	Bermuda	4	\$12,618
65	SV	El Salvador	4	\$5,351
66	MW	Malawi	4	\$4,600
67	QA	Qatar	4	\$2,199
68	LK	Sri Lanka	4	\$4,628
69	TZ	Tanzania	4	\$12,123
70	TT	Trinidad and Tobago	4	\$5,794
71	VG	Virgin Islands (British)	4	\$1,709

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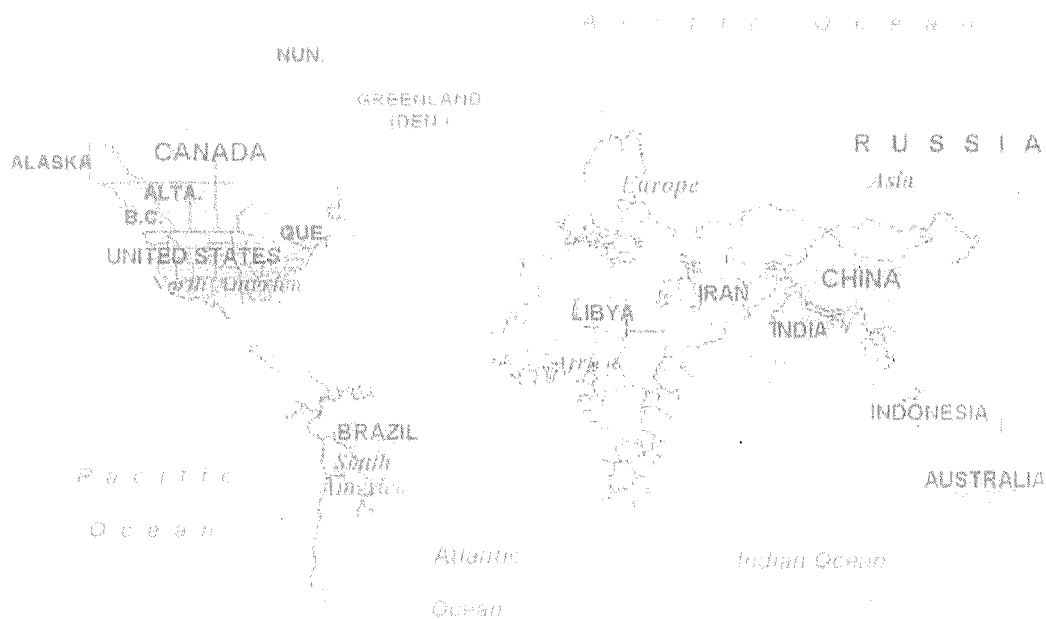
72	CM	Cameroon	3	\$4,064
73	KY	Cayman Islands	3	\$3,324
74	CO	Colombia	3	\$1,812
75	CR	Costa Rica	3	\$3,033
76	CZ	Czech Republic	3	\$5,213
77	EC	Ecuador	3	\$7,173
78	GU	Guam (USA)	3	\$2,838
79	MU	Mauritius	3	\$2,556
80	RO	Romania	3	\$2,247
81	UG	Uganda	3	\$11,457
82	UY	Uruguay	3	\$3,048
83	AG	Antigua and Barbuda	2	\$1,436
84	AM	Armenia	2	\$572
85	AW	Aruba	2	\$3,147
86	BT	Bhutan	2	\$736
87	DO	Dominican Republic	2	\$1,630
88	ER	Eritrea	2	\$198
89	ET	Ethiopia	2	\$2,630
90	FI	Finland	2	\$1,826
91	GT	Guatemala	2	\$1,627
92	HU	Hungary	2	\$936
93	MO	Macau	2	\$1,036
94	MK	Macedonia	2	\$1,227
95	RW	Rwanda	2	\$789
96	SI	Slovenia	2	\$2,851
97	SD	Sudan	2	\$2,410
98	SE	Sweden	2	\$1,772
99	SY	Syria	2	\$2,538
100	UM	USA Minor Outlying Islands	2	\$1,181
101	YE	Yemen	2	\$4,065
102	AL	Albania	1	\$2,160
103	BJ	Benin	1	\$835
104	BW	Botswana	1	\$1,405
105	BN	Brunei Darussalam	1	\$881
106	GM	Gambia	1	\$2,351
107	GY	Guyana	1	\$731
108	HT	Haiti	1	\$386
109	CI	Ivory Coast (Cote D'Ivoire)	1	\$1,429
110	LS	Lesotho	1	\$795
111	LY	Libya	1	\$1,185
112	MG	Madagascar	1	\$99
113	YT	Mayotte	1	\$99
114	MA	Morocco	1	\$551
115	NA	Namibia	1	\$1,906
116	AN	Netherlands Antilles	1	\$1,647
117	MP	Northern Mariana Islands	1	\$951

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118	NO	Norway	1	\$1,140
119	PG	Papua New Guinea	1	\$1,010
120	RU	Russian Federation	1	\$3,460
121	KN	Saint Kitts & Nevis Anguilla	1	\$1,495
122	LC	Saint Lucia	1	\$1,390
123	VC	Saint Vincent & Grenadines	1	\$750
124	SL	Sierra Leone	1	\$1,344
125	SR	Suriname	1	\$361
126	TG	Togo	1	\$975
127	TN	Tunisia	1	\$690
128	TC	Turks and Caicos Islands	1	\$99
129	UK	United Kingdom	1	\$561
130	WF	Wallis and Futuna Islands	1	\$99
131	EH	Western Sahara	1	\$99
Total buyers with identified nationality			9165	\$7,137,787

The following world map indicates the world reach of fraudulent academic products sold by the defendants. Countries to which degrees were sent are shaded in pink.



U.S. buyers reside in all 50 states, Puerto Rico, Guam, and the U.S. Virgin Islands.

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University names used on academic credentials

The names of "schools" were extracted from the "buyers list" when this information was available: however, it was available for only 2,247 of somewhat more than 10,000 degrees sold (or approximately 22%). But from this small fraction of the defendant's degree business, the following startling figures arise.

The defendants used the names of 77 different legitimate schools in their sales. Of these, 11 were the names of recognized high schools, while 66 were the names of legitimate post-secondary institutions (nearly all of which are colleges or universities). The genuine high schools whose names were appropriated can be found in at least 11 different states. (Some popular school names—James Madison High School, for example—can be found in several different states.) The genuine colleges and universities span 25 states inside the United States, as well as five foreign countries.

The defendants also used the names of 121 unrecognized schools in their sales of fraudulent academic products. Some were of their own invention ("St. Regis University"), while others were the names of diploma mills operated by their competitors ("University Francophone Robert de Sorbon," for example).

Information concerning a buyer's "university" is unavailable for roughly 80% of the transactions contained in the buyers list. As a result, the quantities of school names extracted from the buyers list is likely a significant underestimate of the actual totals.

Names, locations, and numbers of degrees sold in the names of legitimate schools are shown in the next two tables.

Sales of high school degrees in the names of legitimate schools			
	Name of legitimate school	State	Degrees
1	Blackwell High School	OK	1
2	Boston Latin High School	MA	1
3	Bradford Academy High School	MI	2
4	Carlin High School	NV	2
5	JA High School	MN	5
6	James Madison High School	VA	1
7	James Monroe High School	CA	13
8	Liberty High School	PA	188
9	Tift County High School	GA	1
10	Trinity High School	KY	1
11	University High School	IL	5
		11 states	220 degrees

Sales of post-secondary degrees in the names of legitimate schools				
	Name of legitimate institution	State	Country	Degrees
1	Ajman University of Science and Technology		United Arab Emirates	1

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2	Ambassador College	CA	United States	1
3	Ambassador University	CA	United States	1
4	American University	DC	United States	3
5	Auburn University	AL	United States	2
6	Bergen Community College	NJ	United States	1
7	Biblical Theological Seminary	PA	United States	1
8	Bradford College		Great Britain	8
9	Bradley University	IL	United States	1
10	Brenau University	GA	United States	3
11	California State University	CA	United States	2
12	California State University Long Beach	CA	United States	1
13	California State University, Northridge	CA	United States	2
14	Chicago Technical College	IL	United States	1
15	Clark Atlanta University	GA	United States	4
16	Clayton State University	GA	United States	1
17	Clemson University	SC	United States	1
18	Concordia	MN	United States	41
19	Concordia College	MN	United States	15
20	Concordia University	WI	United States	124
21	El Camino College	CA	United States	1
22	Fairmont State University	WV	United States	1
23	Florida Community College	FL	United States	1
24	George Washington University	DC	United States	1
25	Georgia State University	GA	United States	1
26	Heritage	WA	United States	1
27	Jackson State University	MS	United States	1
28	John Carroll University	OH	United States	1
29	Lawrence Technological University	MI	United States	1
30	Lethbridge Community College		Canada	1
31	Marine Corps University	VA	United States	2
32	Middlesex University		Great Britain	1
33	National Academy of Paralegal Studies	NY	United States	1
34	New York Institute of Technology	NY	United States	1
35	Northrop University	CA	United States	2
36	Northrop University of Engineering & Science	CA	United States	1
37	Nova Southeastern University	FL	United States	1
38	Penn State University	PA	United States	1
39	Point Loma University	CA	United States	1
40	Potomac College	VA	United States	1
41	Prince George's Community College	MD	United States	1
42	Regents College	NY	United States	1
43	Sacred Heart College		New Zealand	1
44	San Francisco State University	CA	United States	1
45	San Jose State University	CA	United States	1
46	Shelby State Community College	TN	United States	1
47	Spellman College	GA	United States	1
48	St. Leo University	FL	United States	1

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49	St. Louis Community College	MO	United States	1
50	St. Michael Institute	WA	United States	1
51	SUNY Geneseo	NY	United States	1
52	Texas A&M University	TX	United States	1
53	Trinity	TX	United States	9
54	Universidade Estacio De Sa		Brazil	1
55	University of Arizona	AZ	United States	1
56	University of California, Los Angeles	CA	United States	1
57	University of Houston	TX	United States	1
58	University of Illinois at Chicago	IL	United States	1
59	University of Nebraska	NE	United States	1
60	University of Phoenix	AZ	United States	1
61	University of Tennessee	TN	United States	1
62	University of the Punjab	IN	United States	1
63	Upsala College	NJ	United States	1
64	Valencia Community College	FL	United States	1
65	Vision Christian University	CA	United States	1
66	Wayne State University	MI	United States	1
		25 states	6 countries	270 degrees

The locations of the legitimate schools whose names were used by the defendants are shown in the next two tables.

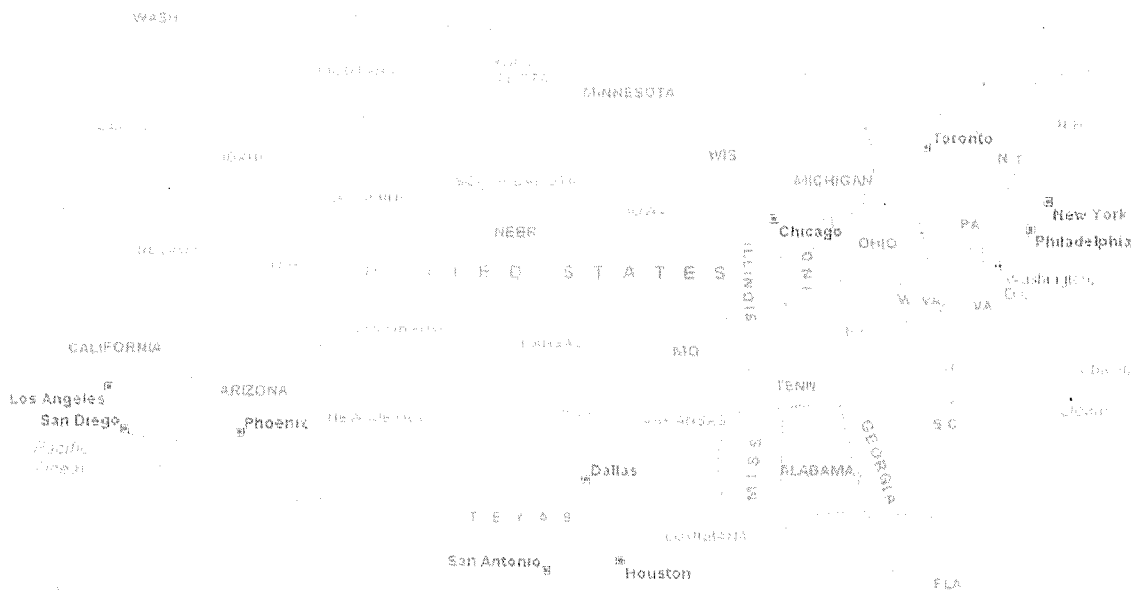
Home states of legitimate schools whose names were used by the defendants' degree-selling business	
AL	NE
AZ	NJ
CA	NV
DC	NY
FL	OH
GA	OK
IL	PA
IN	SC
KY	TN
MA	TX
MD	VA
MI	WA
MN	WI
MO	WV
MS	
29 states	

Home countries of legitimate schools whose names were used by the defendants' degree-selling business
United Arab Emirates
Brazil
Canada
Great Britain
New Zealand
United States
6 countries

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Here is a United States map showing the home states (shaded) of legitimate post-secondary institutions whose names were appropriated by the defendants.



The following table shows information concerning sales of degrees in the names of unrecognized high schools and colleges. Again, keep in mind that most "buyers list" records do not contain information about the "school's" name used in the transaction, so the actual number of different schools and number of degrees sold are likely significantly higher.

Sales of bogus degrees in the names of unrecognized schools		
	Name of unrecognized school	Degrees sold
1	A+ Technical Institute	2
2	Al Qasim University Pakistan	1
3	All Saints American University	10
4	American Art & Science University	1
5	American Capital University	8
6	American Capitol University	1
7	American Coastline University	2
8	American International University	1
9	American West Graduate Institute	1
10	American West University	90

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11	Americana University	8
12	Americus University	1
13	Athenaeum University International	1
14	Atlanta School of Paralegal Studies	1
15	Audentes Technical Academy	1
16	Audentes Technical College	11
17	Barrington University	1
18	Bayon Educational Counseling	1
19	Berkeley Professional University	11
20	Berkely Professional University	4
21	Blackstone University	79
22	Boston College of London	2
23	Branford Academy College Preparatory High School	10
24	Branford Arts Academy	1
25	Breyer State University	38
26	Brown's International University	6
27	Cambridge International University	3
28	Capital American University	5
29	Capital University of Arts & Technology	39
30	Capitol University	5
31	Capitol University of Arts & Technology	1
32	Cathedra University	10
33	Center for Independent Degree Studies	1
34	Cincinnati Technical College	1
35	Columbia State University	2
36	Concordia Bible College	1
37	Concordia College & University	30
38	Concordia Graduate Institute	11
39	Dalorem University	1
40	Davison University	1
41	Easton University	1
42	Edenvale University	1
43	Eucharist Archdiocese University	3
44	Eucharist Graduate Institute	2
45	Garfield University	1
46	Gordon University	1
47	Hampton Bay University	22
48	Hampton College or College of Hampton	1
49	Hartland University	22
50	Heartland University	16
51	Heral Business College	1
52	Holmes Graduate Institute	8
53	Holmes University	68
54	Holy Acclaim Graduate Institute	2
55	Holy Acclaim University	42
56	Imperial University College	1
57	InTech University	12

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58	InTech University of Engineering	1
59	InTech University of Engineering & Science	42
60	International Bible & Seminary	1
61	James Monroe International University	3
62	James Monroe University	27
63	John Foster	1
64	Kane College	2
65	LaSalle University	2
66	Le Lourdes Graduate Institute	2
67	Liberty College Preparatory High School	5
68	London School of Management Science	1
69	Madison College	2
70	Maryland University	3
71	Maryland University College	1
72	Midwest Business College	1
73	Mission College Preparatory High School	175
74	Monroe University	2
75	Monroe University High School	38
76	Mount College	1
77	Nation State University	3
78	National Academy of Higher Education	1
79	New Academy of the Arts	7
80	New Manhattan University	16
81	New University of the Arts	2
82	North United University	2
83	Northburgh University	1
84	Northern Marianas University	1
85	Northwest United University	64
86	Pelham Graduate Institute, Rio Salado University	1
87	Port Rhode University	1
88	Primus College	2
89	Primus Postgraduate Institute	1
90	Primus Postgraduate University	3
91	Prometheus College	5
92	Robertstown University	21
93	Rosemont University	1
94	Shefferton University	1
95	Southern College in Orlando FL	1
96	St. Concordia University	1
97	St. George University	1
98	St. John Quincy Adams Institute	1
99	St. Lourdes Graduate Institute	16
100	St. Lourdes University	177
101	St. Pauls College	1
102	St. Regis University	441
103	St. Renoir University	1
104	St. Renoir University	4

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105	Stanley State University	4
106	Steward University	1
107	Tecana International University	2
108	Trinity Christian High School	10
109	University Francophone Robert de Sorbon	1
110	University of Jacksonville	2
111	Valorem University	8
112	Van Ives University	7
113	West American University	8
114	West Coast Institute	1
115	West Coast Institute of Management & Technology	1
116	West Coast University	11
117	Western American University	1
118	Westmoreland Business Institute	1
119	Whitmore College	
120	Wiltshire University	3
121	Woodrow Wilson College	1
	total	1757

Degree levels

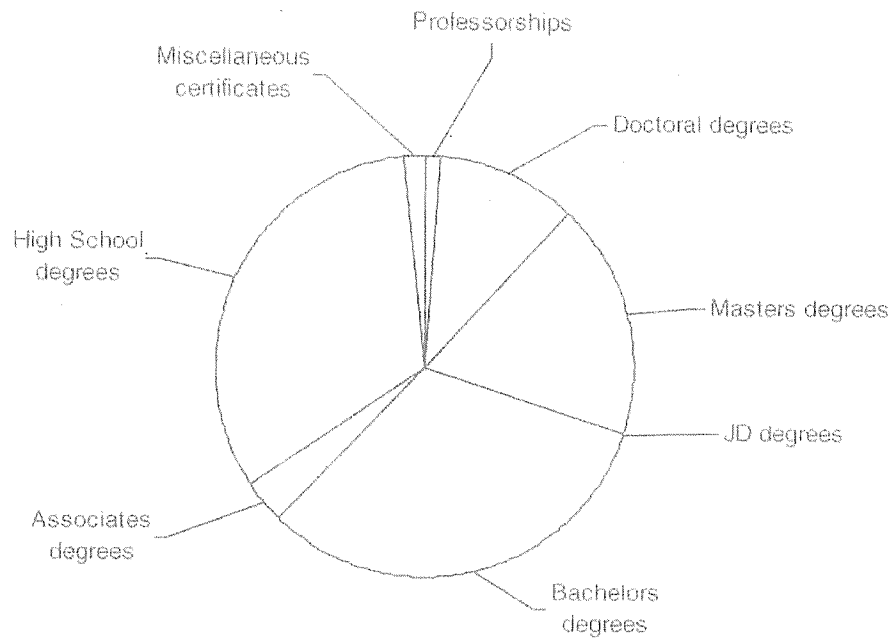
Nearly all the transaction records in the "buyers list" indicate the level of the degree purchased. Bachelors and high school degrees were clearly the most popular, but note that the post-graduate diplomas: masters, doctoral, and JD degrees also comprise about 30% of sales. This is shown in the following table, and the pie chart that follows the table.

Degree sales by level of degree	
Level of credential	Number
Professorships	114
Doctoral degrees	1,145
Masters degrees	1,866
JD degrees	6
Bachelors degrees	3,349
Associates degrees	358
High School degrees	3,425
Miscellaneous certificates	170
total	10,433

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Degree sales by level of degree

Breakdowns of the kinds of degrees at each level are shown in the next several tables.

Professorships	
Full professor	73
Associate professor	20
Assistant professor	3
Adjunct professor	18
total	114

Doctoral degrees	
PhD and MD	1,004
ND	4
EdD	18
DTh	3
DSc	42
Dmin	7
DFA	1
DDiv	3
DBA	63
total	1,145

Masters degrees	
MTh	5
MSW	12
MSN	6
MSE	20
MS	521
MEd	11
MDiv	10
MBA	696
MA	585
total	1,866

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Bachelors degrees	
BTh	3
BSN	28
BSE	81
BS	1,242
BPharm	1
BBA	671
BA	1,323
total	3,349

Associates degrees	
AS	22
AA	336
total	358

Miscellaneous	
Postdoctoral research	2
Certificate	168
JD	6
total	176

High School	
HS	3,425

Fields in which customers purchased degrees

Most sales transactions specified a field of "study" for buyers who purchased post-secondary degrees, although many chose unfocused programs such as "General Studies" or "Liberal Arts." Some customers requested specialized degrees such as a Bachelors of Business Administration, effectively declaring a field of study.

Availability of customer's field of "study" in post-secondary degree transaction record			
level of degree	Degrees	Area of "study" specified by buyer	Area of "study" not specified
Associates	358	202	156
Bachelors	3,349	3,146	203
Masters	1,866	1,705	161
Doctoral	1,145	978	167
Professorship	114	100	14
Miscellaneous credentials	203	156	47
Totals	7,035	6,287	748

The majority of degrees sold can be roughly grouped into the following areas of study:

- Business, finance, manufacturing, and commerce
- Healthcare, including medicine and the behavioral sciences
- Education
- Engineering, architecture, computer science, and technology
- Law and criminal justice
- Physical and biological sciences
- Theology and religion
- The arts and humanities
- Social sciences, social work, journalism, and history
- Public safety, environmental management, and urban planning

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Note that some degrees will be included in more than one category (for example, a PhD in "Biomedical engineering" will appear in the tallies for both healthcare and engineering).

field of "study"	Assoc.	Bach.	Masters	Doctoral	Professor	Cert.	Total	%
Business, finance, manufacturing, and commerce	29	1463	882	299	27	67	2767	40.2%
Healthcare, including medicine and the behavioral sciences	8	279	195	226	20	32	760	11.0%
Education	11	183	140	151	11	20	516	7.5%
Engineering, architecture, computer science, and technology	19	811	360	128	24	26	1368	19.9%
Law and criminal justice	16	271	99	40	8	5	439	6.4%
Physical and biological sciences	82	43	22	10	0	1	158	2.3%
Theology and religion	3	51	51	77	5	10	197	2.9%
The arts and humanities	5	51	33	61	5	2	157	2.3%
Social sciences, social work, journalism, and history	0	202	116	79	4	8	409	5.9%
Public safety, environmental management, and urban planning	3	65	35	9	2	3	117	1.7%
Total	176	3419	1933	1080	106	174	6888	100.0%

The obvious lack of concern for the public's safety is evident in the total numbers of degrees issued in fields such as Healthcare, Engineering, and Public Safety.

Some of the healthcare degrees

The following table and graph show the categories of healthcare degrees that were sold. Note that some degrees ("Nursing education," for example) will contribute to more than one category:

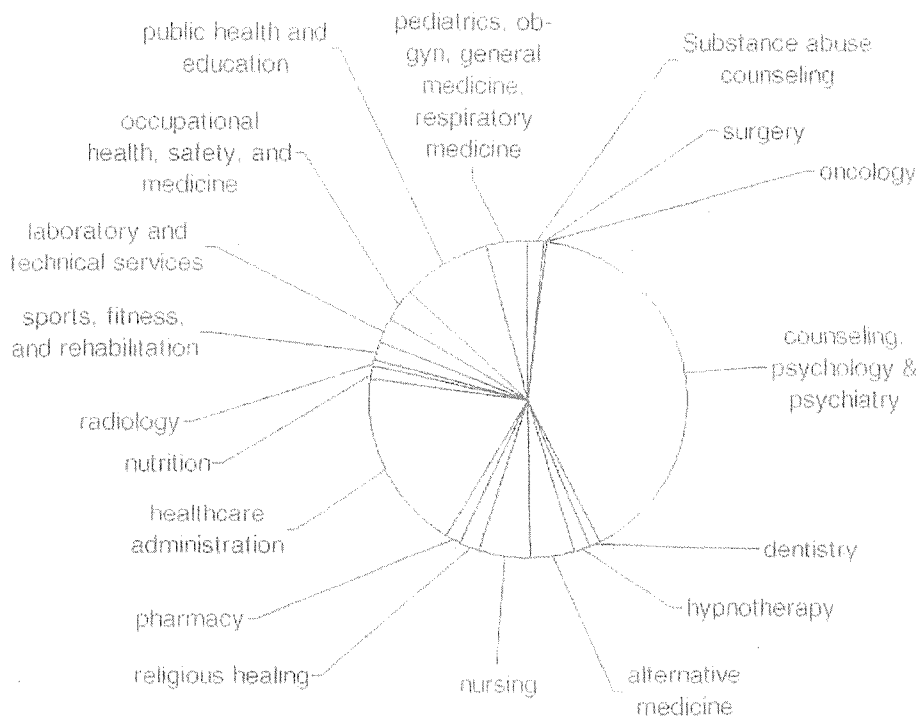
Healthcare fields	
Field	Degrees
Nursing	47
Psychology, counseling, & psychiatry	349
Substance abuse counseling and treatment	14
Pediatrics, ob-gyn, general medicine, respiratory medicine	36
Surgery	1
Oncology	1
Dentistry	10
Radiology	4
Pharmacy	14

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Occupational health, safety, and medicine	29
Nutrition	14
Sports, fitness, and rehabilitation	16
Public health and education	78
Laboratory and technical services	22
Healthcare administration	157
Hypnotherapy	15
Alternative medicine	36
Religious healing	16
Total	859



Healthcare degrees

The levels of the degrees sold for the healthcare subcategories in the previous table are shown in the following table and graph (Note, however, that the total number of degrees sold is smaller than the sum of categories in the previous table because some degrees belong to more than one category).

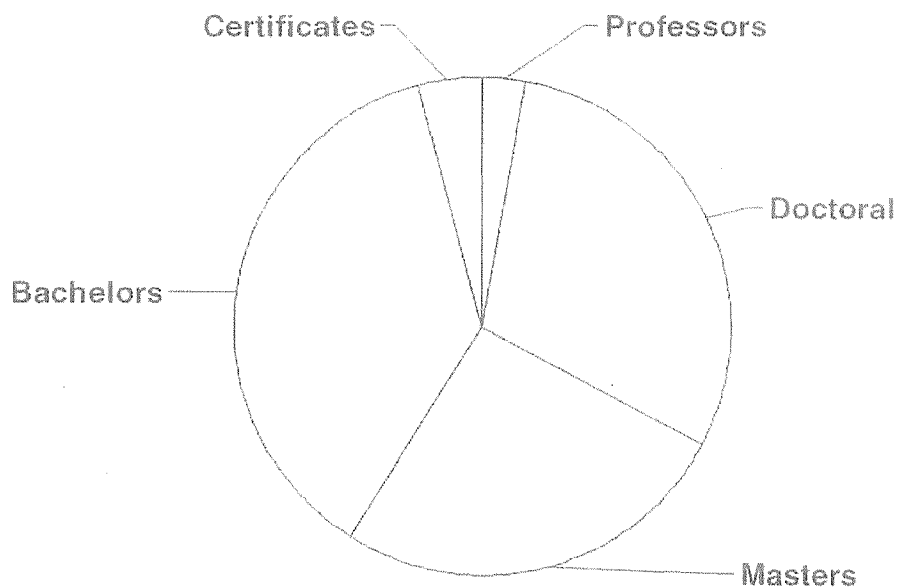
Level of degrees sold	
Level	Degrees
Professorships	20
Doctoral	214

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Masters	187
Bachelors	263
Certificates	30
Total	714



Level of healthcare degrees

Two of the degrees were "Doctor of Medicine" degrees, which can be easily mistaken for the standard MD degree awarded to physicians upon successful completion of medical school.

Some of the engineering degrees

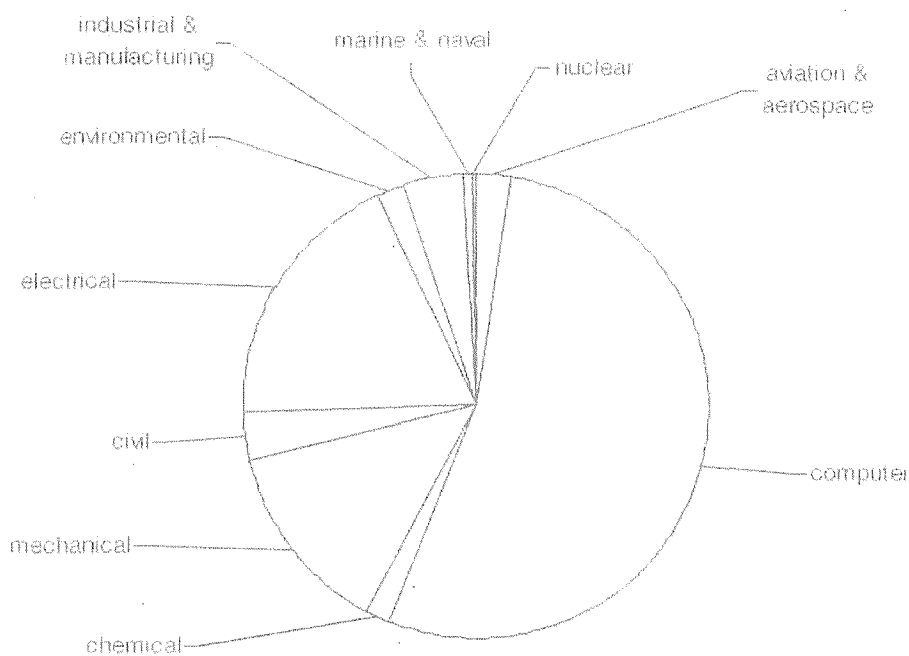
The following table and graph show the categories of engineering degrees that were sold.

Engineering degrees	
Field	Degrees
Aviation & aerospace engineering	21
Computer engineering	438

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Environmental engineering	16
Industrial & manufacturing engineering	33
Marine & naval engineering	5
Chemical engineering	14
Civil engineering	28
Mechanical engineering	108
Nuclear engineering	1
Electrical engineering	152
Totals	816



Engineering degrees

Also of particular note are degrees sold in the Education field; thereby undermining a child or young adult's likelihood of receiving the qualified education our society would expect from a holder of such an advanced degree.

Some of the education degrees

The following table and graph show the categories of education degrees that were sold.

Education degrees

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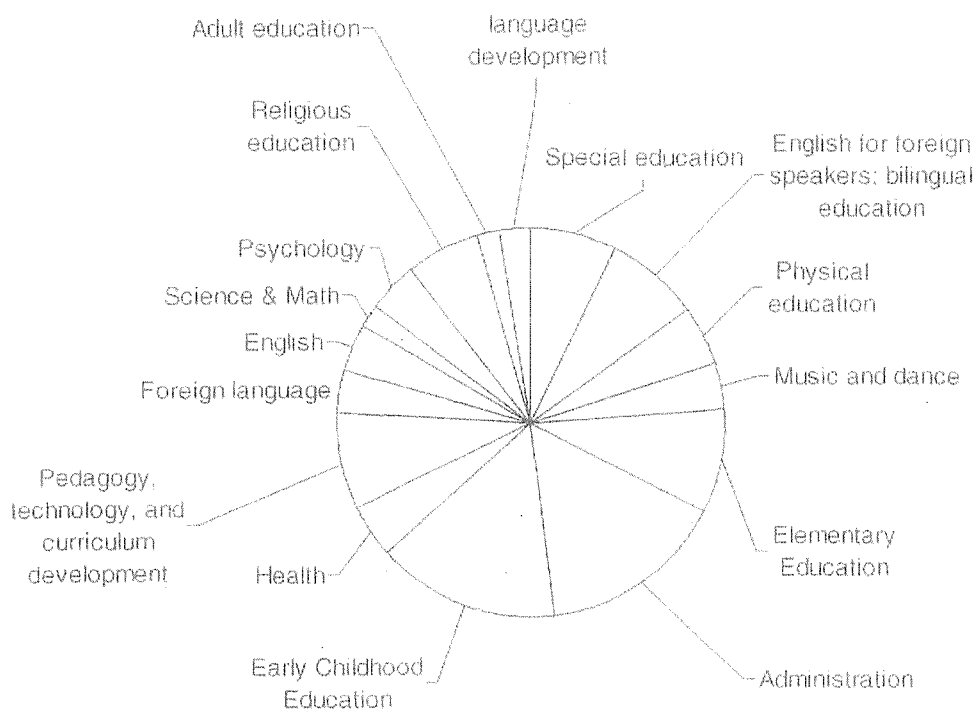
22

Field	Degrees
Special education	27
English for foreign speakers: bilingual education	29
Physical education	19
Music and dance	15
Elementary Education	32
Administration	59
Early Childhood Education	57
Health	17
Pedagogy, technology, and curriculum development	30
Foreign language	14
English	14
Science & Math	8
Psychology	15
Religious education	23
Adult education	8
Linguistics and language development	9
Other fields	27
Unspecified	143
Total	546

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Education degrees

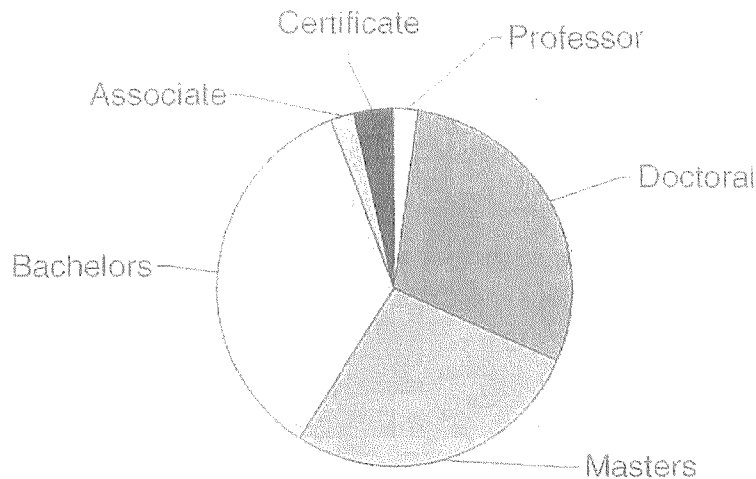
The degree levels range from Associates degrees through Doctoral degrees and "professorships." The next table shows the breakdown of degree levels for education degrees that contribute to the previous table and graph.

Level of degrees sold	
Level	Degrees
Professorships	11
Doctoral	151
Masters	140
Bachelors	180
Associates	11
Certificates	19
Total	512

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Levels of education degrees sold

Revenue vs. Time

The transaction date is available in the buyers list for 7,860 of 10,815 degrees purchased, totaling \$5.3 million. The remaining transactions in the buyers list bring the total sales figure for the defendants' degree-selling business to somewhat more than \$7.3 million, without indicating the date-of-sale.

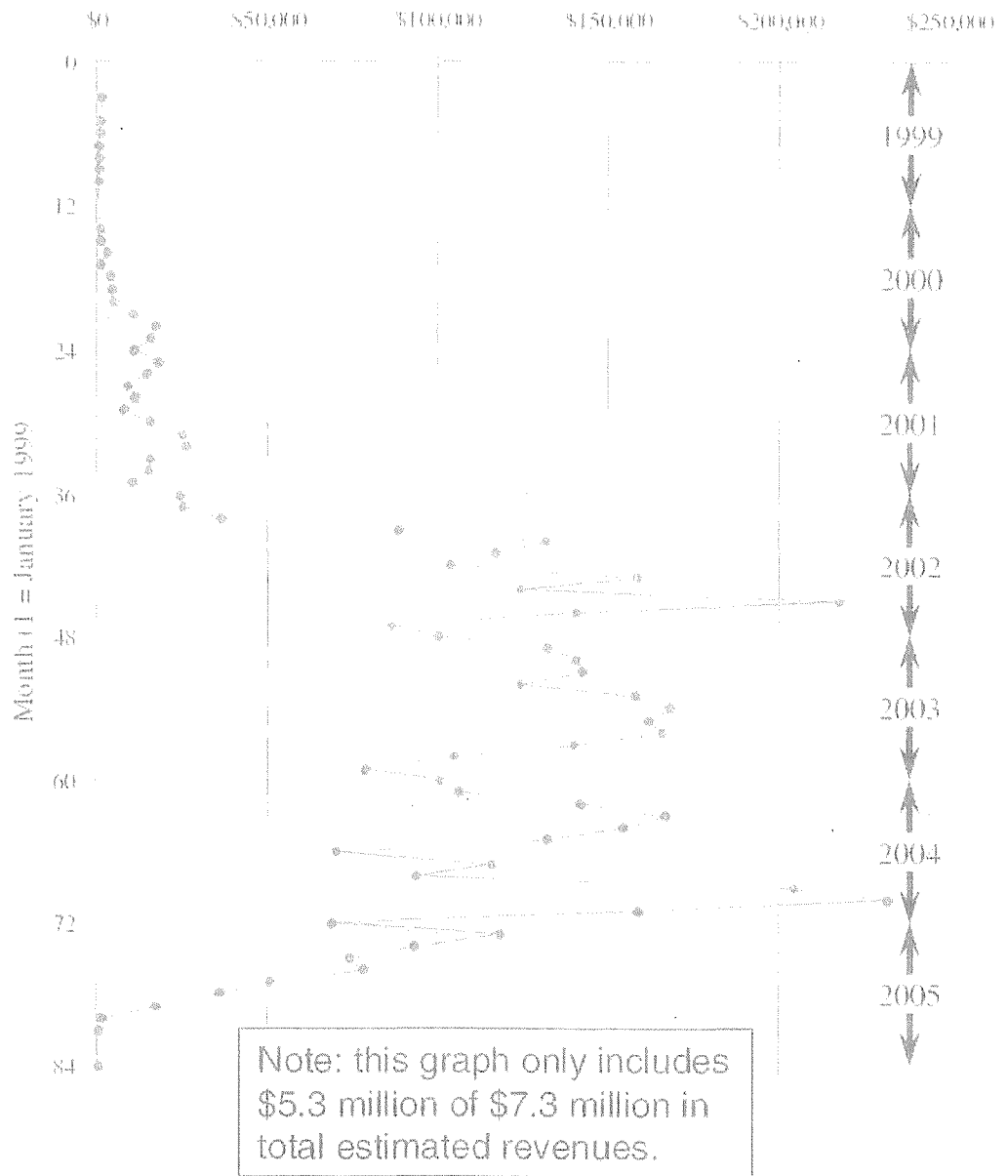
Year	Estimated revenue
1999	\$5,240
2000	\$73,423
2001	\$195,717
2002	\$1,329,482
2003	\$1,618,070
2004	\$1,646,290
2005	\$470,355
Sales date unknown	\$2,027,887
Total sales	\$7,366,464

A graph of the defendants' estimated monthly revenues is shown in the following. Note that this plot only includes the \$5.3 million in sales for which dates-of-sale are present in the buyers list. The data show a sharp rise in sales in March 2003, when revenues soared past \$50,000 per month for the first time. Sales remained brisk until April 2005.

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Estimated monthly revenue since 1/1/1999 for transactions in
which buyers list date-of-sale data is available



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Size of a stack of diplomas

The industry standard for printed diplomas appears to be 72 lb. parchment paper .011 inches thick.¹

Therefore, if all of the fraudulent degrees and diplomas sold by the defendants were stacked and weighted to remove air between documents, the pile of diplomas would be approximately 10 feet high.

If packaged in 1/8 inch thick diploma covers, the pile would be 110 feet high (likely higher than the same Federal Courthouse in which the defendants are being sentenced).

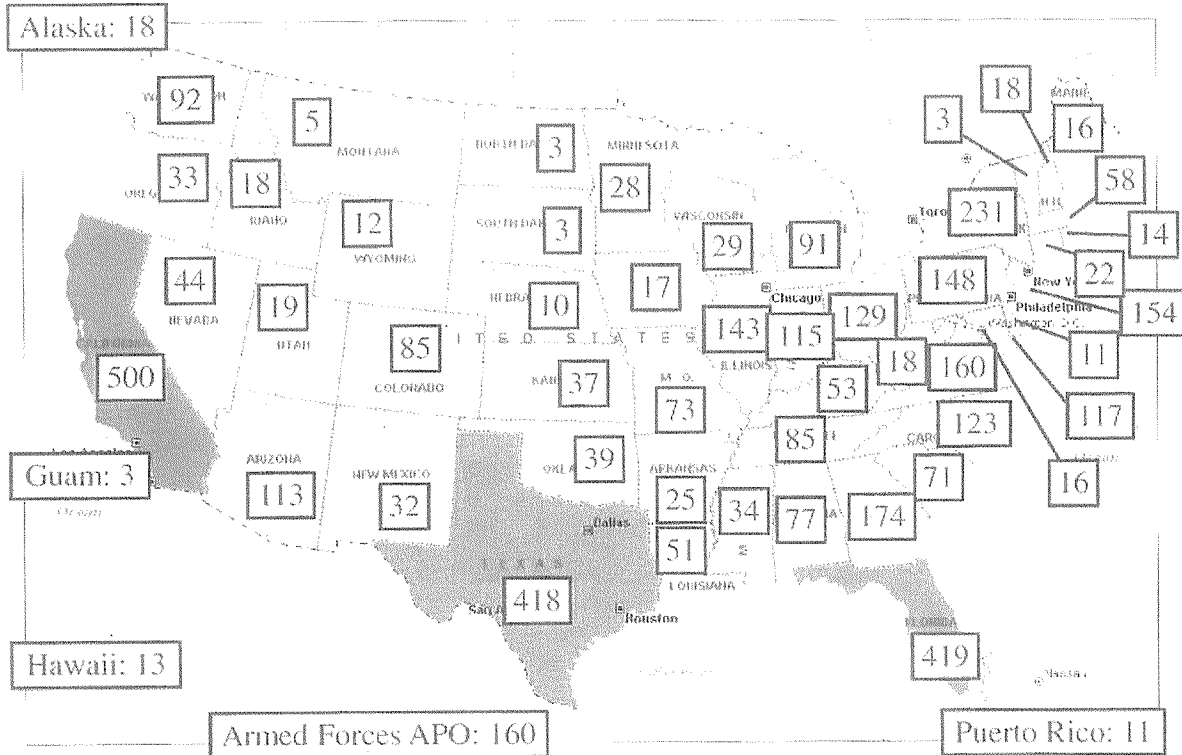
¹ See Micro Format, Inc. web site: www.microformat.com

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Documents were shipped to all 50 states



Addresses are available for 4,395 out of a total of 7,551 U.S. buyers.

State	buyers	State	buyers	State	buyers
Alaska	18	Kentucky	53	Ohio	129
Alabama	77	Louisiana	51	Oklahoma	39
Army Post Office	160	Massachusetts	58	Oregon	33
Arkansas	25	Maryland	117	Pennsylvania	148
Arizona	113	Maine	16	Puerto Rico	11
California	500	Michigan	91	Rhode Island	14
Colorado	85	Minnesota	28	South Carolina	71
Connecticut	22	Missouri	73	South Dakota	3
Washington DC	16	Mississippi	34	Tennessee	85
Delaware	11	Montana	5	Texas	418
Florida	419	North Carolina	77	Utah	19
Georgia	174	North Dakota	3	Virginia	160
Guam	3	Nebraska	10	Virgin Islands	2
Hawaii	13	New Hampshire	18	Vermont	3
Iowa	17	New Jersey	154	Washington	92
Idaho	18	New Mexico	32	Wisconsin	29
Illinois	143	Nevada	44	West Virginia	18
Indiana	115	New York	231	Wyoming	12
Kansas	37				

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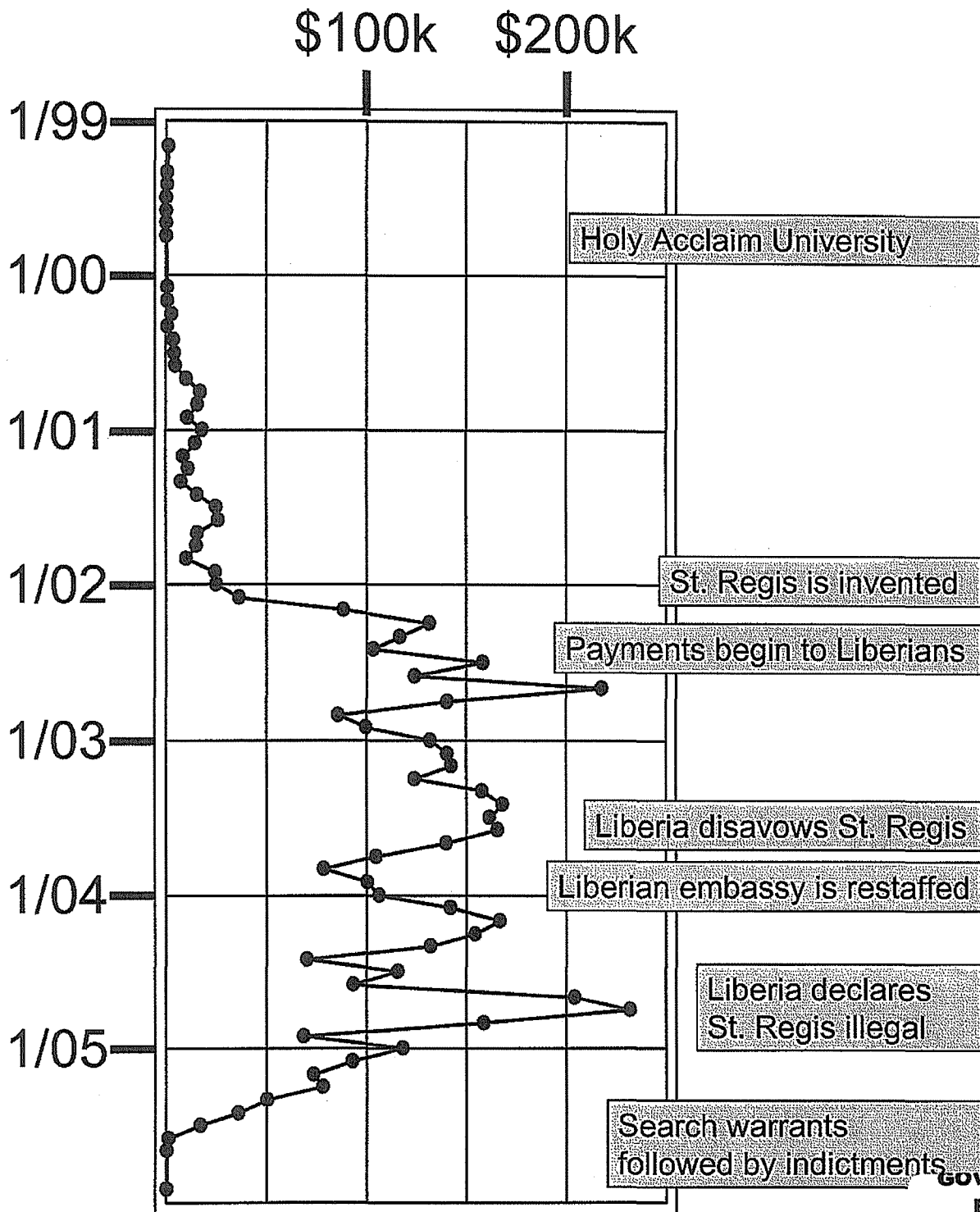
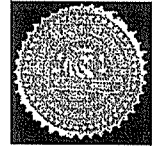
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Monthly revenue 1999-2005



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The State Journal-Register (Springfield, IL)

February 19, 2008 Tuesday

SECTION: NEWS; Pg. 1**LENGTH:** 890 words**HEADLINE:** Diploma mills pose degrees of danger**BYLINE:** SARAH ANTONACCI STAFF WRITER sarah.antonacci@sj-r.com**BODY:**

George Gollin filled out the paperwork to get a public policy degree from Belford University.

He said his life experience reading newspapers and watching the nightly news qualified him for a diploma. Belford agreed.

Then he changed his mind and told Belford he believed that his life experience actually made him better qualified to receive a doctorate in thoracic surgery.

"And they said, 'Sure,'" said Gollin, a physics professor at the University of Illinois at Urbana-Champaign whose avocation is exposing diploma mills and pushing for tougher laws against them.

Belford is one of many online entities where people can purchase high school diplomas or college degrees. Gollin believes such diploma mills cost American taxpayers hundreds of millions of dollars a year, threaten national security, jeopardize people's health and possibly harm countries already on the brink of collapse.

Gollin's interest in the subject came after he received a number of spam e-mails from a similar diploma mill. Annoyed, he tried to contact the school. In return, he got a sales pitch. And that started him on a mission to out the mills.

Last week, an East St. Louis woman was arrested on federal charges that she had stolen \$50,000 from a Montgomery County residential treatment facility where she had worked as executive director - a job she got by presenting a fake diploma and transcripts from St. Regis University.

Federal authorities in central Illinois talked to law enforcement in Washington state, where eight people have been charged, and four convicted, of federal charges connected with St. Regis.

"What we charged were the principals who operated the diploma mill," said Tom Rice, first assistant U.S. attorney in the eastern district of Washington.

The owners of St. Regis allegedly claimed the university was a legitimate school in Liberia and bribed Liberian officials and used the Liberian Embassy in their scheme. The 40-page indictment accuses the group of trying to launder more than \$1 million as a result of the scheme.

As part of the investigation, a U.S. Secret Service agent posed as a retired Syrian military officer who wanted to get a U.S. visa. Using the fake name Mohammed Syed, the agent reportedly was able to buy degrees in chemistry and environmental engineering from a diploma mill owned by the same couple that owns St. Regis.

Government's Exhibit B

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Some states have passed laws making it illegal to use fake degrees. Illinois is one of them.

Gollin is working toward getting federal measures passed, including the **Diploma Integrity Protection Act**. The federal bills would allow federal and state educational and law enforcement entities to work together to review new educational institutions, identify diploma mills, prosecute and to stop the use of fake degrees for immigration and federal employment.

In the Montgomery County case, the damage was merely lost money, but Gollin can talk about other cases where the damage is far more substantial:

* John Curran was convicted of wire fraud and money laundering in Rhode Island after he obtained a "medical degree" from St. Luke University. The degree, obtained without having to take a class, allowed him to get a job as a doctor. His medical advice led to the death of at least one person.

"The problem with medical degrees scares everyone, and it should. Nuclear engineers should scare people," Gollin said.

* Federal court documents indicate about 5 percent of diploma mill customers are federal employees and another 5 percent are state government employees. The fake degrees are used to garner raises.

Gollin said he calculates that by the 200,000-diplomas-per-year figure, some 10,000 federal government employees might receive a \$4,000- to 5,000-a-year raise. In one year, that adds up to a \$50 million cost to U.S. taxpayers.

"If you consider that over a half dozen years, you probably have several hundred million a year in tax money just going to pay for raises those people have obtained. They'll have those raises until they retire, and then it will be part of their pension until they die. That's hundreds and hundreds of millions a year going into the pockets of these people," Gollin said.

* Academic documents that indicate a person has certain kinds of training, such as in engineering, can help a person obtain an H-1B work visa for entry into the United States.

Gollin points to the case where the Secret Service agent posed as a man named Mohammed Syed.

"He created an undercover identity and requested a degree for a bomb maker who wanted to stay in the U.S., and the St. Regis told the bomb maker that it was proud of its graduates and it takes Visa and Mastercard," Gollin said.

* Fake diplomas are especially dangerous to developing countries, where people with fake degrees might pretend to be bridge builders or doctors.

"That's one of the most awful things. They need trained doctors and engineers," Gollin said. "The countries with tremendous death and heartbreak will send tremendously angry young people out into the world who are bent on (creating problems)."

How many?

Experts estimate that about 200,000 fake diplomas are purchased each year from at least 22 fraudulent universities. People fill out short questionnaires, tell their life experiences and hand over some money - \$300 to \$3,000, or more - and they get diplomas, complete with documentation.

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August 16, 2005

Bogus degrees offer way to U.S.

By Bill Morlin
Staff writer

Foreign nationals, including potential terrorists, could legally gain entry into the United States with fraudulent degrees purchased from Spokane-based diploma mills, documents made public Monday reveal.

Half the "degrees" sold by Saint Regis University and other diploma mills were sold to overseas purchasers, a majority of which were for "students" from Saudi Arabia, the documents say.

The documents don't give a specific number of degrees sold overseas, but they disclose the operation based in Spokane and

Diploma mill probe reveals half of online credentials were sold to foreigners

North Idaho has "made millions" in the last few years.

Offshore bank accounts are being used as part of the alleged money-laundering operation directed by Dixie and Steve Randocks, the documents allege.

An eight-month task force investigation, outlined in the documents, revealed that a top-ranking Liberian diplomat based in Washington, D.C., was soliciting cash bribes from the Randocks and their associates based in Spokane, Post Falls and Arizona.

The Liberian Embassy official demanded the bribes in exchange for lining up "accreditation" for Saint Regis University and other diploma mills and for arranging payments of \$50 to \$100 a month to Liberian educators who would pose as "faculty members" for the online universities.

As part of the investigation, the demands for the "cash pay-

Continued: Diploma mills/A5

Diploma mills: On the verge of filing charges

Continued from A1

ments" were secretly videotaped during a July 5 meeting at the Mayflower Hotel in Washington, D.C., where an undercover U.S. Secret Service agent from Spokane attempted to buy an online diploma mill for \$100,000.

Abdullah Dunbar, the deputy chief of the Liberian Embassy in Washington, D.C., demanded \$5,000 and an expense-paid trip to his homeland to finalize accreditation for the online university, the court documents allege.

Asked if any laws were being violated by making such a demand, Dunbar responded, "Nah, I'm a diplomat," according to the court documents. If he isn't charged, U.S. authorities are expected to seek Dunbar's deportation, according to a source familiar with the case.

There have been no arrests, and no criminal charges have been filed.

But a 141-page affidavit, filed Monday in U.S. District Court, makes it clear that the task force is on the verge of seeking federal charges for conspiracy, wire and mail fraud, money laundering, bankruptcy fraud, income tax evasion and engaging in "prohibited foreign trade practices."

Federal sources say the most troubling aspect of the investigation revealed that foreigners who purchased such bogus online degrees could then be eligible for "H1-B" visas, using their educational backgrounds as reasons for legitimate entry into the United States.

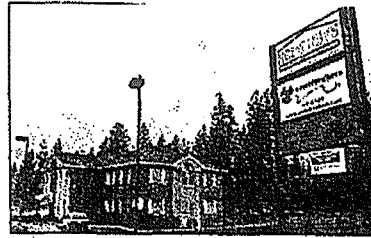
During the investigation, an undercover Secret Service agent using the name "Mohammed Syed" applied for a college degree from James Monroe University.

The applicant, court documents say, filled out an online application, claiming he had obtained "multiple hours of training in chemistry and engineering" as a member of the Syrian Army.

Syed said he was in the United States on a visitor's visa, "but wanted to quickly obtain college degrees so he could find employment and obtain a H1-B visa to remain in the United States," the documents say.

Within a month, the operators of the bogus online university, believed to be based in Spokane, responded by e-mail, telling Syed he could purchase college degrees in chemistry and environmental engineering for \$1,277.

"The payment form also provided the opportunity for 'Mohammed Syed' to backdate any of his degrees and choose whatever date of completion he would like," the documents said.



File/The Spokesman-Review

Branford Academy, an online school offering high school and community college degrees, has been listing its address at this building at 14525 Newport Highway in Mead. The school was registered to ex-Realtor Dixie Randock.

The meeting with Dunbar at the Washington, D.C., hotel was set up by Richard Novak, of Peoria, Ariz., identified in court documents as an associate of Dixie and Stephen Randock.

The Randocks' home in Colbert, just north of Spokane, and their business office at 14525 N. Newport Highway were among five locations in the Spokane area searched last week by a multi-agency federal and state task force, led by the U.S. Secret Service.

Novak told an undercover agent that the Randocks' three main online universities, Saint Regis, Robertstown and James Monroe, "have made millions of dollars over recent years."

Despite some recent "negative press (attention), James Monroe and the other schools are still fully recognized and accredited by the Liberian government," Novak told the agent, according to the documents.

Agents also searched Novak's home in Arizona and a business office in Post Falls, used for shipping diplomas, and a stamp works at 5210 N. Market, operated by Blake Carlson.

Documents seized in the search show the Hillyard businessman has conspired with the Randocks, listing himself as the "dean of studies" of Robertstown University, and "provost and chief academic officer" for Saint Regis University — two of the bogus diploma mills.

Carlson also describes himself as "co-founder of the World Chapel Ministries," which says it is "dedicated to the mission of helping Christians through the life experiences, missions and ministry attain valid, government-recognized degrees, ordinations and certifications."

In the course of the investigation, the undercover Secret Service agent also purchased a high school degree, a two-year associate of arts degree, and a four-year "bachelor's degree in pre-law."

He also purchased "official transcripts for four full years' worth of college classes which never occurred," the court documents say.

■ Bill Morlin can be reached at (509) 459-5444 or by e-mail at billm@spokane.com

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Copyright 2007 Spokane Spokesman-Review
Spokesman Review (Spokane, WA)November 11, 2007 Sunday
Idaho Edition**SECTION:** B; Pg. 1**LENGTH:** 945 words**HEADLINE:** Bill targets 'diploma mills';
Spokane criminal case;
inspires federal legislation**BYLINE:** Bill Morlin Staff writer**BODY:**

Federal legislation inching its way through Congress would outlaw "diploma mills" like those at the center of a criminal case being prosecuted in Spokane.

Eight members of Congress are co-sponsoring the proposed "**Diploma Integrity Protection Act**," introduced earlier this year by Rep. Betty McCollum, D-Minn.

The legislation would "reduce and prevent the sale and use of fraudulent degrees in order to protect the integrity of valid higher education degrees that are used for federal purposes."

Even though the impetus for the proposed legislation was the worldwide diploma mill operation uncovered in Spokane, the region's congresswoman has declined to be a co-sponsor.

Republican Rep. Cathy McMorris Rodgers has "reservations about the legislation" currently supported only by House Democrats, according to her chief of staff, Connie Partoyan. "We are very supportive of the spirit and intent of the bill," Partoyan said Friday.

However, McMorris Rodgers thinks the proposal contains some "duplication" of oversight provided by existing laws and government agencies. "We are working to make the bill better," Partoyan said.

The Eastern Washington congresswoman, meanwhile, "is pleased that in Spokane they are taking this issue seriously and prosecuting, at the federal level, those who run diploma mills," Partoyan said.

Possibly as early as this week, the bill - or at least significant portions of it - is expected to be attached to higher education reauthorization funding that's before the House Education and Labor Committee. As a member of that House committee, McMorris Rodgers will get to vote on the legislation.

She has been urged to support McCollum's legislation by the Rev. Robert Spitzer, president of Gonzaga University.

Spitzer's support comes in part because Gonzaga's sister Jesuit school, Regis University in Denver, was caught in the confusion created by "Saint Regis University," one of 125 bogus online universities and high schools created by the Spokane-based operation.

"The impact on Regis University by this 'Saint Regis' pseudo-university, coming out of this diploma mill here in

Government Exhib C-1

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Spokane, had been significant," said Dale Goodwin, public information officer for Gonzaga.

"Father Spitzer was more than happy to urge Rep. McMorris Rodgers to go ahead and co-sponsor this bill," Goodwin said. The Gonzaga president "supports any tightening of the rules on these diploma mills."

Regis University in Denver also strongly supports the proposed federal legislation, said spokeswoman Kristen Blessman.

Regis president, the Rev. Michael J. Sheeran, S.J., said the university's "name and good reputation were significantly damaged by the efforts of a diploma mill known as Saint Regis University."

"Although government authorities were sympathetic, there was minimal legal protection for (our) university," Sheeran said last week. "It's important that these same authorities be better armed in the future with laws that protect legitimate institutions of higher education, employers and future students from fraud."

McCollum, a co-sponsor, said she was "incensed" by news reports about the phony college degrees being sold around the world by the Spokane-based diploma mill operators.

"I care about quality higher education, and it was shocking to learn about the prevalence of fake degrees and the dangers they pose," she said. "My legislation ensures that we will be able to trust the credentials of our doctors, engineers, government employees and skilled immigrant workers."

McCollum said last week she hopes the language of her bill will be integrated into the Higher Education Act by committee chair Rep. George Miller, D-Calif.

U.S. Attorney Jim McDevitt, the chief federal law enforcement official in Eastern Washington, said Justice Department policy prevents him from commenting on proposed new laws "but we're always looking for new and better law enforcement tools, especially ones that clarify certain areas of the law."

He oversaw the work of a multi-agency state and federal task force that spent nine months investigating the Spokane diploma mill, first publicly detailed in a story published in November 2003 in The Spokesman-Review.

Investigators discovered that many of the people who bought the bogus credentials - from bachelor's to doctoral degrees - were foreign nationals. They used the degrees to get H-1B visas and improve their chances to immigrate to the United States.

The revelation that potential terrorists could use bogus degrees to enter the United States caused homeland security concerns that reached the highest levels of government.

In October 2005, for the first time in the U.S., a federal grand jury returned a multicount indictment against eight people for the operation of an Internet-based diploma mill that defrauded "consumers worldwide."

Those indicted included former Spokane Realtor Dixie Randock, her husband, Steven Randock, and her associates who operated out of offices in Hillyard, Mead and Post Falls.

The Spokane-based operation raked in an estimated \$4.7 million in sales of fraudulent college degrees, court documents say.

Four defendants have pleaded guilty, but Randock and her husband await trial next year on the charges, also including money laundering.

SIDEBAR:

AT A GLANCE

While authorities refuse to release names, purchasers of the phony degrees from the Spokane-based diploma mill included at least 135 U.S. government employees who got career advancements and pay raises. That list, according to court proceedings, includes a member of the White House staff, employees of the National Security Agency and the Justice Department, New York City firefighters, and military officers.

NOTES: Bill Morlin can be reached at (509) 459-5444 or billm@spokesman.com

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OPERATION GOLD SEAL UNDERCOVER SUMMARY

SET FORTH BELOW IS A SUMMARY OF UNDERCOVER CONTACTS DURING THE PERIOD APRIL 5, 2005, AND AUGUST 10, 2005, BETWEEN DEFENDANT RICHARD JOHN NOVAK, ANOTHER INDIVIDUAL WHO COMMUNICATED USING THE FALSE IDENTITY "J.F.," (SUBSEQUENTLY IDENTIFIED AS DIXIE ELLEN RANDOCK), THE SAINT REGIS UNIVERSITY "BOARD" (SUBSEQUENTLY IDENTIFIED AS DIXIE ELLEN RANDOCK AND STEVEN KARL RANDOCK, SR.) AND SPECIAL AGENTS OF THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY, UNITED STATES SECRET SERVICE (THE SPECIAL AGENTS WERE ACTING IN AN UNDERCOVER CAPACITY AND WERE POSING AS THE OWNERS OF AN ONLINE BUSINESS, WWW.RADTU.NET, INTERESTED IN LEARNING HOW TO SELL DEGREES BASED ON LIFE EXPERIENCE AND OBTAIN ACCREDITATION)

During the Operation Gold Seal investigation, on April 5, 2005, United States Department of Homeland Security, United States Secret Service, Special Agent (SA) Greg Ross, using the undercover identity "Gregory Roberts," and posing as the President of an internet entity, "Randolph Addison Davis Technical University (www.radtu.net), and using an undercover email account, greginthedesert@hotmail.com, accessed the James Monroe University website at www.jamesmonroeuniversity.ac and sent the following message:

Hello,

My name is Greg Roberts, and I am very impressed and interested in what you have established here in James Monroe U. I am the President and one of the Proprietors of Randolph Addison Davis Technical University online (www.radtu.net). We are in the process of researching the industry and establishing our presence appropriately. Your school and internet presence is very well done and yours is one of a few schools I'm interested in learning

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from or perhaps partnering with. Do you engage in any such partnerships or would you be willing to negotiate for information pertaining to accreditation in Liberia and/or through the other accrediting organizations listed in your site? Thank you for your consideration,

Gregory Roberts
President
Randolph Addison Davis

On April 6, 2005, SA Ross's undercover email account received the following response from info@university-services.net.

Dear Gregory,

We may be interested in some sort of partnering. As you know it takes many years and a huge financial and commitment investment to become accredited by a Minister of Education, and also many connections and loads of work to get the ancillary and support services one needs to effectively offer a great online school. Regardless of the quality of your programs your students will still expect and need to be able to have their degrees evaluated by Members of AACRAO and NAFSA as equivalent to US regionally accredited degrees. Our schools have this advantage. Many may also require apostilles and authentication services for transfer to other schools, immigration and to use their degrees in other countries. You will also need quality printing services, certified PLA evaluators (if you are going to offer credit for Prior Learning) and many other services). Please tell us more about your school faculty, programs, location, etc. Once we have a good picture of what you are doing we will offer you options that may be helpful to your particular need. Best of luck to you! Please contact us anytime for assistance. You will find our staff very accommodating and helpful.

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*Operation Gold Seal Undercover Summary**Page 3*

Sincerely,

[individual using the name identified by the initials "J.F." subsequently identified as Dixie Ellen Randock]

On April 6, 2005, SA Ross, using his undercover identity, provided additional information about RADTU, indicating that it would be an online technical "university" that would provide "degrees" based on "life experience" and the student's willingness to pay the fees.

On April 7, 2005, SA Ross received the following email from "James Monroe University,"

Thank you for the information. I personally feel that you have a good basis to begin an excellent school. You have contacted us at a very good time, as the head of our Board has expressed a desire to at least partially retire and is discussing selling or partnering or turning over operations or affiliation with a stable organization to allow some freedom from a demanding position.

Please tell me where your school will be located and licensed. This is a very important factor and I may be able to give you some helpful advice to help you deal with and overcome the many limitations of laws regarding higher education regulations.

One university we are currently talking with (for a possible similar arrangement) is 100% online but based in one State that is accommodating. They too are in need of the many benefits we can offer such as government recognition, accreditation by a Minister of Education, reports of equivalency by Members of AACRAO and/or NAFSA, apostilles and authentications by US Secty of State and all foreign Embassies, a complete line of Challenge exams whereby a

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*Operation Gold Seal Undercover Summary**Page 4*

candidate may test out for an entire curriculum of courses resulting in a degree (upon passing), Certification of your PLA evaluators, and in addition we can get French Minister of Education approval as a legitimate VAE university with headquarters in Paris, many international connections and relationships (crucial to this business) and years of experience which you may draw upon at all times.

Of course your school is brand new and has no history, so it would be impossible to turn over our school to one that is untested. But, you do have some very good features and I have faith your school will be well run and successful if you have accreditation, equivalency by recognized agencies, ability to get apostles and embassy seals, and the other services we provide. So, we can work with you by providing these services if we can work out a mutually beneficial arrangement, or you may want to consider buying one of our schools which of course would give you instant accreditation and all services without years of applications and red tape. If you'd like to meet in person we can certainly make arrangements to come to you or meet in some prearranged setting. Of course we can give you non-disclosure agreements and everything discussed would be confidential.

Please give me your thoughts on the above points and reply after you have had time to discuss possibilities with your team.

Respectfully,

[individual using the name identified by the initial "J." subsequently identified as Dixie Ellen Randock]

On May 3, 2005, SA Ross received an email to his undercover email account for "Greg Roberts" at gregonthedesert@hotmail.com, from [individual using the name identified by the initial "J."] via info@university-services.net. [individual using the name identified by the initial "J."] stated in his email to

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“Greg Roberts” (SA Ross) that his group was “willing and eager to work” with Roberts. [individual using the name identified by the initial “J.”] stated in the email that they are willing to sell one of their existing “schools,” and/or help Greg Roberts in any number of ways. [individual using the name identified by the initial “J.”] asked Greg Roberts to telephonically contact “Rick” (previously established to be Rick Novak) at [Arizona telephone number].

On May 13, 2005, SA Ross placed a recorded telephone call to Mr. NOVAK’s Arizona telephone number. SA Ross, assuming the U/C role of “Greg Roberts,” referenced his communications with [individual using the name identified by the initial “J.”] and informed Mr. NOVAK that he was calling to discuss potential options for partnership with Mr. NOVAK, [individual using the name identified by the initial “J.”] and “James Monroe University.” Mr. NOVAK confirmed that he is the primary international consultant for James Monroe University, and he stated that he had full authority to negotiate for “James Monroe University.” Mr. NOVAK stated that they would be interested in helping “Greg Roberts” and his business group in establishing a new online technical “university.” Mr. NOVAK indicated that he was currently engaged in another activity and asked “Greg Roberts” to call him at home late that day. Mr. NOVAK

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provided a home telephone number. This first telephone call lasted approximately eight minutes and a copy was made by SA Ross and placed into evidence.

On May 13, 2005, SA Ross placed another recorded telephone call to Mr. NOVAK's cellular telephone. SA Ross, as U/C alias "Greg Roberts," engaged Mr. NOVAK in communication about potential "business deals." Mr. NOVAK confirmed that he represented a "group" of online "university" owners who own and receive the profits from three primary online schools: "James Monroe University," "Saint Regis University," and "Robertstown University." Mr. NOVAK stated that the ownership group of these schools made "millions" of dollars over recent years with these online schools. Mr. NOVAK stated that despite some recent negative press, "James Monroe University" and the other "schools" are still fully recognized and accredited by the Liberian government. Mr. NOVAK indicated that he recently received a verification letter from the Liberian Education Ministry confirming the recognition of the "schools" by Liberia. SA Ross, as "Greg Roberts," asked Mr. NOVAK about the possibility of purchasing the ability to become accredited and recognized by all of the same entities represented on the "James Monroe University" web site, including AACRAO, NAFSA, and the Liberian Education Ministry. Mr. NOVAK

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confirmed that his group would be able to accommodate Greg Robert's and his group and would likely want to meet with them to discuss further options. Mr. NOVAK asked "Greg Roberts" to send him an email at degrees@university-services.net, including the options that "Greg Roberts'" business group would like to pursue. This phone call lasted approximately 30 minutes and a recording was made and placed into evidence in this case.

On May 14, 2005, SA Ross sent an email to NOVAK at degrees@university-servcies.net from the U/C email account for "Greg Roberts," greginthedesert@hotmail.com. SA Ross indicated that he would like to meet with the ownership group of "James Monroe University" to discuss the possible purchase of one of their "schools," or to perhaps simply purchase the rights to use some of the same "accreditations" that are represented on the "James Monroe University" web site.

On May 17, 2005, SA Ross received an email from NOVAK at degrees@university-services.net. NOVAK emailed "Greg Roberts" to state that he had discussed the proposals with the "ownership group" of "James Monroe University" and the other "schools." NOVAK stated that the "group" wishes to remain anonymous in any proposed transactions. NOVAK stated in the email that

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he has been granted full power of attorney to represent them in any business pertaining to the "schools." NOVAK further indicated in the email that the group would be interested in selling "Greg Roberts" the rights to "Robertstown University."

On May 17, 2005, SA Ross replied to NOVAK's email at degrees@university-services.net. SA Ross stated that he believed the anonymity in a possible business deal might be an issue, but that he would "discuss the deal" with his team and would telephone NOVAK later in the week.

On May 19, 2005, SA Ross received another email from NOVAK at degrees@university-services.net to SA Ross' U/C "Greg Roberts" account at greginthedesert@hotmail.com. NOVAK's email indicated that he was still conversing with "the board" regarding our possible deal; he stated that he was also working on getting his letter from Liberia "apostilled" and notarized. NOVAK suggested that "Greg Roberts" contact him further in a few days.

On June 16, 2005, SA Ross received an email to his undercover email account from NOVAK via degrees@university-services.net. In his email message, NOVAK informed "Greg Roberts" (SA Ross) that he was forwarding an "exact email I received from the Board." NOVAK's email further stated that he

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recommended that "the Board" was offering their "online university" for sale and that SA Ross would be "getting a very good deal." The email message forwarded to SA Ross by NOVAK, purportedly from "the Board," indicated that SA Ross was being offered the option to purchase "Robertstown University" for \$100,000. Within this offer, "the Board" stated in their email that SA Ross would also receive "[name not redacted in original] apostilled recognition letter," as well as "templates to create RU documents." The email message from "the Board" also made reference to "problems from the past with [individual identified by the initial "G."] and his crew," urging NOVAK to help SA Ross avoid such problems.

On June 20, 2005, SA Ross sent a reply email from his undercover email account as "Greg Roberts," to NOVAK at degrees@university-services.net. SA Ross indicated in his email message that he was not interested at that time in further pursuing a purchase of "Robertstown University" from "the Board." SA Ross instead made inquiries of NOVAK regarding the possibility of acquiring separate "accreditation" and "recognition" from the Liberian government for the U/C online university "Randolph Addison Davis Technical University." SA Ross also inquired about NOVAK's willingness to work for him directly in a capacity of "consultant" to help him establish this new "online school."

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On June 22, 2005, SA Ross received an email to his undercover "Greg Roberts" email account from Richard Novak at degrees@university-services.net. Novak informed SA Ross that "the Board" has been "having problems with [individual identified by the initials "G.G."]. NOVAK indicated that he would be open to assisting in providing help and information in setting up the new "online school." NOVAK stated that he would highly recommend "doing business" with Liberia, and that he (NOVAK) "know(s) everyone in the Government." NOVAK also informed SA Ross that he does "all of the D.C. document work, which includes Notaries, Apostilles, and all Embassy Authentications."

On June 23, 2005, SA Ross received an email to his U/C "Greg Roberts" account from NOVAK at degrees@university-services.net. NOVAK's email stated that "I believe the first thing to do is to sit down and have a meeting in person." NOVAK asked SA Ross to "make arrangements" for him to travel "wherever you would like to have the meeting."

On June 27, 2005, SA Ross received and recorded a telephone call from NOVAK. NOVAK called SA Ross at his (Ross') U/C cellular telephone number. SA Ross informed NOVAK that his "team" was planning to continue with "Randolph Addison Davis University." SA Ross told NOVAK that he agreed

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with his email message suggesting that an in-person meeting would be a good idea. NOVAK informed SA Ross that he has a contact "with the Liberian Embassy" with whom SA Ross should also meet. SA Ross and NOVAK agreed that SA Ross would arrange the logistics and details involved in having a meeting in Washington D.C. It was agreed by NOVAK and SA Ross to have a meeting in Washington D.C. also involving NOVAK's "Liberian" contact. During this same telephone conversation, SA Ross inquired about the fact that "James Monroe University" now has an "Italian connection," listing "accreditation" in Seborga, Italy. NOVAK stated that he believed that Liberia was "an excellent place to do business," and he recommended it over "Seborga" because Liberia is a "real government." NOVAK stated that Seborga, Italy is a separate principality and not as "good" as Liberia for the purpose of setting up the online businesses. SA Ross informed NOVAK that he would contact him again shortly to discuss and arrange the details of having a meeting.

On June 28, 2005, SA Ross conducted a recorded telephone call to NOVAK at his home telephone number. SA Ross and NOVAK agreed to have a personal meeting in Washington D.C. on July 7, 2005. SA Ross agreed to NOVAK's request to arrange his travel and stated that he (SA Ross) would contact NOVAK

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in the near future to provide travel and flight information.

On 6/29/05, SA Ross purchased an airline ticket for Richard Novak to travel from Phoenix, AZ, to Washington, D.C. on 7/6/05, returning 7/8/05. SA Ross purchased the airline tickets through Delta Airlines on the online travel web site www.orbitz.com. SA Ross purchased the electronic ticket utilizing the confidential funds in his U/C MasterCard account for "Greg Roberts."

On 6/30/05, SA Ross emailed the details of Richard Novak's flight/ticket information to Novak at degrees@university-services.net. On this same date, SA Ross received an email reply from Rick Novak confirming his receipt of the information. In his email, Rick Novak also asked "what hotel will I be staying at?" implying that he expected SA Ross to additionally arrange and pay for his hotel room in Washington, D.C.

On 7/5/05, SA Ross, SA Paul Kemppainen and SA Neirinckx traveled to Washington, D.C. in order to conduct an undercover meeting with Richard Novak. SA Ross checked into the Mayflower Hotel, 1127 Connecticut Ave NW, Washington, D.C., under the U/C alias of "Greg Roberts." SA Ross paid for his room at the Mayflower utilizing confidential funds from the U/C MasterCard account for "Greg Roberts." SA Ross also paid with the same U/C credit account

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for a room for Richard Novak at the Mayflower Hotel for the nights of 7/6/05 and 7/7/05. SA Kemppainen and SA Neirinckx checked in under U/C aliases of Paul Weirimaa and John Reagan.

On 7/5/05, SA Ross telephonically contacted Richard Novak at his cellular telephone number. Novak confirmed that he would be traveling the following day from his home in Phoenix to the Mayflower Hotel in Washington, D.C.

On 7/7/05, SA Ross, SA Kemppainen and SA Neirinckx conducted a surveillance and undercover operation in which we met in an undercover capacity with suspect Richard NOVAK. SA Ross, in the role of "Greg Roberts," was wired with digital recording device. Additionally, other video and audio recording equipment was set up within Room 230 of the Mayflower Hotel, 1127 Connecticut Ave NW, Washington D.C. SA Kemppainen and SA Neirinckx also utilized alias' for the undercover meeting, acting respectively as "Paul Wierimaa" (SA Kemppainen) and "John Reagan" (SA Neirinckx). SA's Ross, Kemppainen and Neirinckx met with suspect Richard Novak beginning upon his arrival at approximately 1:00pm in the Mayflower Hotel Suite 230.

Shortly after meeting Richard Novak upon his arrival to the U/C meeting, SA's Ross, Kemppainen and Neirinckx engaged Mr. Novak in a "business

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meeting” in which the agents continued SA Ross’ previously established undercover story that they are a business group that is attempting to establish a new “online university.” Because NOVAK had previously offered to “consult” and “help” SA Ross in this regard, the agents, acting in their undercover capacities, indicated to NOVAK that they would first like to ask him numerous questions about the “business” of online schools, and specifically about his role working for “the Board” who, Novak had already told SA Ross, is the owner of “St. Regis University,” “James Monroe U.,” and “Robertstown U.” During the initial hour of the U/C meeting, NOVAK re-confirmed his previous statements to SA Ross that he is the individual who does “all of the international work” in reference to establishing “accreditation” and “recognition” from foreign governments for NOVAK’s clients, “the Board” and their “online universities.” Mr. NOVAK indicated that “the Board” who owns the aforementioned “St. Regis, JMU, and Robertstown” was originally responsible for paying to send him to Liberia to establish a presence there and to arrange “accreditation.” Further, NOVAK indicated early in the meeting that his “Liberian contact” is, in fact, the [title not redacted in original] to the U.S. for Liberia, and works out of the Liberian Embassy. When describing the key to successfully doing business with Liberia,

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NOVAK referenced the fact that one needs to make sure that money finds its way "into pockets" in order to succeed. Mr. NOVAK indicated to the U/C group that he believed that he could coordinate with the appropriate Liberian government officials, in terms of both payments and "paperwork" to help the group.

During the U/C meeting, SA Ross provided paperwork to Richard NOVAK. SA Ross indicated that the group wanted him to sign a "Non-Disclosure contract" before further discussing business plans. Richard NOVAK agreed, and signed the document as provided by SA Ross at approximately 2:30pm. The real purpose for the "Non Disclosure document was twofold: to obtain two signature samples from Mr. NOVAK and to further add to the perceived "legitimacy" of the U/C "business group." It should be noted that the signatures provided by Richard Novak on the U/C "Non-Disclosure" document appear similar to the "Richard Novak" signatures on three notarized documents previously obtained in this investigation: the Diploma Authentication Attestation, Transcript Authentication Attestation, and Degree Authentication Attestation, each sent in the document packet from "James Monroe" to S/A Ross' U/C "student" alias of "Anthony Gwynn." At that time, Mr. NOVAK further discussed with the U/C group the details of his historical relationship with "the Board" or "the SRU (St. Regis) group." NOVAK

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informed [the group] that St. Regis "was huge," but eventually became too high profile and became the focus of such individuals as [identified by the initials "J.B.," "G.G." and "A.C."], who worked to attack "the SRU group." NOVAK stated that eventually, because of the efforts of [J.B., G.G.], et al, the media attention combined with the pressure on the U.S. government to take action against St. Regis was too high. NOVAK said that St. Regis then lost their "accreditation" because of financial pressure placed upon the Liberian government from the U.S. government. Thereafter, "the Board" was forced to transition their primary "online university" resources from St. Regis to "James Monroe University." NOVAK stated that he at one point received a letter on behalf of "the Board," from [name redacted], the deputy Minister of [redacted] for Liberia. This letter from [name redacted] reportedly stated that official Liberian recognition of James Monroe and Robertstown Universities will continue.

As the undercover meeting with Richard Novak progressed, NOVAK continued to provide details of "St. Regis University's"(SRU) historical relationship with Liberia. NOVAK stated that SRU operated a small office in Monrovia, set up by NOVAK himself, for the purpose of appearing to have a real presence there. However, NOVAK stated that the office was basically there

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simply for appearances and that "the Board" ran all of the "school's" operations from the U.S., specifically from Washington State and Idaho. NOVAK stated that a "key" to operating as an "online school" is the governmental accreditation. He indicated that the only thing separating an "online university" from a "degree mill" is the formal accreditation. However, NOVAK was clear throughout the meeting that a "school" does not need to meet any formal requirements to obtain that "accreditation" other than meeting and providing payment to the right people within a government, and then setting up a small office in that country to look as though business is being done there. NOVAK also advised at one point that the primary legal concern in engaging in this form of "online school" would be possible prosecution for fraud. However, he assured the U/C group that no law enforcement authorities have ever attempted to investigate "the Board" from SRU/JMU/etc. When questioned about the income tax implications of running one of these "schools," NOVAK stated that it is important to devise a method of "beating" the IRS. He advised that foreign bank accounts are a good method for processing and holding payment funds as collected from "students" via credit card and "PayPal" accounts. NOVAK said that "the Board" specifically used an account in Dominica, but he said that they lost that money because the Dominican

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bank was closed down due to money laundering. NOVAK stated that he has not handled any of the foreign banking issues for "the Board," but that he does all of the other "international work." As an example, NOVAK indicated that he was the first to establish a "faculty" for "the Board" and "SRU." NOVAK stated that he approached ten legitimate faculty members from a campus-based college in Liberia, AMEU, and offered them each \$75.00/month to answer email questions about their fields and provide approval to use their resumes and names on the web site as "faculty." NOVAK made it clear that a key to operating an "online school" is to represent the existence of multiple "faculty," even though the "faculty" do not really engage in any instruction or course work with any "students." He stated that a good website needs to have "accreditation" and "faculty" for credibility purposes only and need not be genuine. He also spoke to the U/C group extensively about "documents" and the need for credible-looking documents such as degrees, transcripts and supporting documentation. NOVAK confirmed that "the Board" uses their printing office in Idaho to create the "official" degrees and other core documents with seals, embossments, etc. However, NOVAK stated that he was the one responsible for generating and coordinating the supporting documents such as "authentications." NOVAK stated that he has all of the

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connections at the foreign embassies in Washington D.C., so he has been able to obtain official-looking documents with "apostilles" in support of the SRU/JMU degrees. However, NOVAK made clear that these supporting documents "say nothing" and are essentially meaningless. Yet, he said that "the Board" would offer them for sale at around \$1800 in support of their bogus degrees, and that these worthless documents being sold for \$1800 were an extremely profitable offering to "students." NOVAK informed us that at one time he was making approximately \$10,000/month in profit from his "documents," separate from the profit being made by "the board. He also stated that the majority of his documents were for foreign countries, a majority of which were for "students" from Saudi Arabia. When asked about his requirements for payment if he were to work for the U/C group, NOVAK stated that we could pay him in whatever manner we prefer. He emphasized the fact that if our group were to pay him and not declare anything for tax purposes, then he would also not declare the income, and that is what he prefers. He stated that when you make that much money, you don't want to give it to the U.S. government.

At approximately 5:10pm, [name redacted] arrived at Suite #230 at the Mayflower Hotel to join the meeting with Richard NOVAK. Reports from the

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surveillance team later confirmed that [name redacted] had come directly to our meeting from the Liberian Embassy. After a brief introductory discussion, [name redacted] confirmed that he could help the U/C group obtain "accreditation" with his Liberian government, specifically the Ministry of [redacted]. [Name redacted] agreed that he would travel to Liberia with Richard NOVAK in order to acquire "accreditation" and the documents for proof of such. [Name redacted] stated that the only firm requirement that SA Ross and his group really need, in order to get an accreditation, is to establish a physical office with a staff in Liberia. [Name redacted] confirmed NOVAK's statements that the two of them could travel to Liberia, meet with the top officials from the Ministry of Education and Justice, make "payments" to the appropriate parties, and return to the U.S. with "official" documents representing the group's U/C "school" as being officially accredited and recognized in Liberia. [Name redacted] and NOVAK each informed the group that the key to their trip will be to secure a meeting with the Minister of [redacted]. They also said that a meeting will be needed with the Minister of [redacted]. [Name redacted] stated that he will make some telephone calls and figure out the total cash requirement for "payments" to be made on their trip. Additionally, [name redacted] agreed that he would accept a payment of \$5,000, plus all

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expenses paid, to travel with NOVAK to Liberia and coordinate the successful “accreditation” process for our U/C “school,” “Randolph Addison Davis technical university.” When SA Neirinckx asked [name redacted] if there were any laws being violated by directly paying him for these services, [name redacted] responded “nah, I’m a diplomat.”

At approximately 6:00pm, our U/C meeting concluded. Both NOVAK and [name redacted] left hotel suite #230, and the operation, including all ongoing audio and video recordings, was terminated.

On 7/9/05, SA Ross received a telephone call to his U/C cellular telephone from Richard NOVAK. NOVAK informed SA Ross that he had been contacted by [name redacted], and that [name redacted] had called to confirm that “things looked very good,” in reference to meeting with and making payments to the Liberian Officials discussed previously in our 7/7/05 U/C meeting. Further, NOVAK informed SA Ross that he would contact “the Board” regarding the potential for our U/C group to meet with them and view the Idaho printing office for document processing.

On the same date, SA Ross received an email from Richard NOVAK via NOVAK’s email of degrees@university-services.net to SA Ross’ U/C account of

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greginthedesert@hotmail.com. NOVAK informed SA Ross that he has recently been in communication with "the Island of Vanuatu" and that "they would also be open to business."

On 7/14/05, SA Ross received an email from Richard NOVAK in reply to a previous email sent to NOVAK by SA Ross as U/C alias Greg Roberts. NOVAK stated in his email that he would agree to SA Ross' proposed terms of \$10,000 as payment for his role in traveling to Liberia and coordinating meetings and payments to key Liberian officials to obtain "accreditation" for SA Ross' illegitimate "online university," plus an additional \$10,000 bonus for successfully getting the "accreditation" accomplished with nothing more than monetary payments to officials and a bogus curriculum and business plan. Also in this email, NOVAK provided his bank account number, into which he asked SA Ross to deposit \$1000 as payment for work being done by NOVAK for "Randolph Addison Davis." SA Ross had previously informed Novak via email that his group would pay NOVAK \$1000 in exchange for the following: set up a meeting with "the Board" as well as a tour of the reported Idaho printing shop where SRU/JMU/Robertstown degrees and other documents are created; provide to SA Ross' group some "samples" of the original illegitimate "curriculum" created by

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the "St. Regis Group/Board" to obtain Liberian "accreditation" as well as a copy of the letter from Liberian Deputy Minister of Education [name redacted], confirming the continued "recognition" of "James Monroe University" by the Liberian government. Novak agreed to provide these documents and arrange a meeting for SA Ross' group with "the Board."

Also on 7/15/05, SA Ross received an additional reply email to his U/C account of greginthedesert@hotmail.com, from Richard NOVAK at NOVAK's secondary email account of panamarick@highstream.net. In his email to SA Ross, NOVAK outlined the proposed events of the upcoming meeting between SA Ross' "business group" and "the Board." NOVAK stated that SA Ross' team would fly into Spokane, rent a car, and drive to the Idaho border. NOVAK also informed SA Ross that he will be further working on the proposal with "the Board" for SA Ross' team to possibly purchase "James Monroe University."

On 7/16 and 7/21/05, SA Ross received additional emails from Richard NOVAK's email account. Novak informed SA Ross that he was continuing to discuss matters with "the Board" and continuing to work on our multiple proposed deals involving his trip to Liberia with [name redacted], as well as our possible trip to "the Board's" Idaho printing site.

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On 7/27/05, SA Ross received an email to his undercover "Greg Roberts" account from Rick Novak's email account. Novak stated in his email that he had sent a DHL package to SA Ross, containing documents that Novak mentioned to SA Ross and other undercover agents involved in the 7/7/05 undercover meeting with Novak in Washington, D.C. Novak's email stated that SA Ross should receive the DHL documents on 7/27/05.

On 7/27/05, SA Ross received a telephone call from DHL Shipping in Spokane, WA. DHL informed SA Ross that the DHL shipping office in Arlington, TX, had received a shipment addressed to "Greg Roberts" from Rick Novak. DHL informed SA Ross that DHL would forward the package to Spokane and would be available by 7/29/05.

On 7/29/05, the Spokane RO received a fax from the USSS Office in Phoenix, AZ, containing six pages. The fax contained a Mailbox Service Agreement between The UPS Store and Rick Novak. The agreement is dated 7/28/03, for post office box #xxx. Rick Novak listed his company as Interfaith Educational Ministries with mail to be delivered in the name of U.S. Documents, Inc. Novak listed the business as "educational."

On 7/29/05, SA Ross received and reviewed the contents of the DHL

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document shipment sent by Rick Novak to "Greg Roberts" in Arlington, TX. The documents included within the packet consisted of the following:

- A three page "Articles of Incorporation" document for "James Monroe University" in the Republic of Liberia.
- One page "Notary Certificate" notarizing the aforementioned "Articles of Incorporation."
- One page list of "Recognized Higher Education Institutions of Liberia," signed by [name redacted], Director General, Liberian Commission of Higher Education.
- One page letter, signed by [name redacted], Director General, Liberian Commission of Higher Education, purportedly "recognizing" "Saint Regis University," "James Monroe University," and "Robertstown University," dated 2/5/05.
- Four (4) copies of "Certificates of Recognition & Accreditation," signed by "[named redacted], Executive Director," representing Liberian recognition to "James Monroe University" and "Robertstown University."

On 8/10/05, SA Ross received an email to his undercover "Greg Roberts" email account from Rick Novak's email account. Novak stated in his email that he had just received an email from "the board" and was forwarding that email in its entirety. (It should be noted that on the following day, 8/11/05, Novak identified "the Board" as Steve and Dixie Randock, and said that all communications from "the board" are actually from Dixie Randock). The following are quoted excerpts from "the Board" (Dixie Randock's email) to SA Greg Ross' undercover alias of Greg Roberts:

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Dear Greg,

I am sure that after speaking with Rick Novak you understand the challenges of Liberia that faced James Monroe University. However, we do still have Liberian recognition but have chosen not to promote it because of the controversy. Instead we moved the main headquarters to Seborga Italy and became licensed and accredited by their Department of Education in addition to our Liberian recognition and our India DEC accreditation (Distance Education Council) Further, we have recently added in other memberships and quality assurance accreditations including pre-approval for our degrees to be evaluated as equivalent to U,S regionally accredited degrees and U.K; Royal Charter degrees by a Corporate Sponsor of U.S. AACRAO and Member of both NAFSA and UK NARIC. Our Board will agree to partner with you, giving your school full benefit of all of our accreditations. All of your records will also be archived in Delaware with OTAC. We normally take 40% of all income and provide all printing, shipping and include in each an equivalency report (as described above). I have more than 10 years experience in distance education and have founded several of the largest if not the largest online schools. I think that adding in a salary for Rick for his services to continue working with you to find additional accreditations is good, or perhaps an agreement to purchase from him the authentications and include one in each of your graduation packages is another idea that may work as a reasonable award. Including the ribboned US Secretary of State Authentication adds a great deal of value to your degrees and will more than pay for itself. We have added to our accreditations (this week) affiliation with a Russian university that is licensed with the Russian Education Ministry and CDEA, a Tennessee quality assurance accreditation organization.

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